

## UNITED STATES COURT OF APPEALS FOR THE FIRST CIRCUIT

Case name IN RE: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE COMMONWEALTH OF PUERTO RICO; TH FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE  
 District Court Case No. 17-BK-3283-LTS District of Puerto Rico   
 Date Notice of Appeal filed March 14, 2022 Court of Appeals Case No. 22-1193  
 Form filed on behalf of Maira Ivet Feliciano Rosado

## TRANSCRIPT REPORT

Transcript Not Necessary for this Appeal Transcript Already Filed in District Court. List each transcript by docket entry number and date and type of proceeding (attach separate page if necessary) N/A

## TRANSCRIPT ORDER

Name of Court Reporter N/APhone Number of Reporter N/A

A. This constitutes an order of the transcript of the following proceedings [check appropriate box(es) and indicate dates of hearing(s)]:

PROCEEDING(S)	HEARING DATE(S)
<input type="checkbox"/> Jury Voir Dire	<u>N/A</u>
<input type="checkbox"/> Opening Statement (plaintiff)	<u>N/A</u>
<input type="checkbox"/> Opening Statement (defendant)	<u>N/A</u>
<input type="checkbox"/> Trial	<u>N/A</u>
<input type="checkbox"/> Closing Argument (plaintiff)	<u>N/A</u>
<input type="checkbox"/> Closing Argument (defendant)	<u>N/A</u>
<input type="checkbox"/> Findings of Fact/Conclusions of Law	<u>N/A</u>
<input type="checkbox"/> Jury Instructions	<u>N/A</u>
<input type="checkbox"/> Change of Plea	<u>N/A</u>
<input type="checkbox"/> Sentencing	<u>N/A</u>
<input type="checkbox"/> Bail hearing	<u>N/A</u>
<input type="checkbox"/> Pretrial proceedings (specify) _____	<u>N/A</u>
<input type="checkbox"/> Testimony (specify) _____	<u>N/A</u>
<input checked="" type="checkbox"/> Other (specify) <u>PROMESA</u>	<small>The Judge transcribed her determination in the order of March 24, 2022, and ad verbatim we quote her words: Ms. Maira I. Feliciano Rosado's s Proof of Claims form asserts that b</small>

NOTE: Any form that fails to specify in adequate detail those proceedings to be transcribed will be considered deficient.

B. I certify that I have contacted the court reporter and the following financial arrangements for payment of the transcript have been made:

<input type="checkbox"/> Private funds.
<input type="checkbox"/> Government expense (civil case). IFP status has been granted and a motion for transcript at government expense has been allowed. (Attach a copy of the order to each copy of this order form.)
<input type="checkbox"/> Criminal Justice Act. A CJA Form 24 has been approved by the <u>district court</u> judge.
<input type="checkbox"/> Criminal Justice Act. A CJA Form 24 is attached for authorization by the court of appeals.
<input type="checkbox"/> Federal Public Defender/Government Counsel - no CJA Form 24 necessary.

Filer's name Maira I. Feliciano RosadoFiler's Signature Maira I. Feliciano RosadoFirm/Address Calle Elena Segarra #154 El Maní, Mayagüez, PR 00682-6123Filer's Email address mfeducederec@yahoo.comTelephone number (939) 865-3987Date mailed to court reporter May 16, 2022

(Court Reporter Use ONLY) Date received \_\_\_\_\_



**Prime Clerk**  
Grand Central Station PO Box 4850  
New York, NY 10163-4850

In re Commonwealth of Puerto Rico  
Case No. 17-03283  
United States Bankruptcy Court for the District of Puerto Rico (San Juan)

PRIME CLERK RECEIVED YOUR  
PROOF OF CLAIM.

Date Filed: 10/18/2021  
Proof of Claim No.: 179662

For additional information, please visit  
<http://cases.primeclerk.com/puertorico>, or  
call us at 844.822.9231.

Maria Ivet Feliciano Rosado  
Calle Elena Segarra #154  
Sector El Mani  
Mayaguez, PR 00682

SRF 59775

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

-----X

In re:

PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)  
Debtors.<sup>1</sup>

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**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR THE HEARING ON FEBRUARY 16-17, 2022 AT 9:30 A.M. AST**

**Time and Date of  
Hearing:** **Wednesday, February 16, 2022,**  
from 9:30 a.m. to 12:30 p.m.  
(Atlantic Standard Time)  
and  
**Thursday, February 17, 2022,**  
from 9:30 a.m. to 12:30 p.m.  
(Atlantic Standard Time)

Honorable Laura Taylor Swain, United States District Judge

**Location of Hearing:** **The Hearing will be conducted virtually via videoconferencing  
and telephonic platforms.**

**Participation by Individuals Who Have Been Notified to Attend:**  
**Claimants who have been notified that their claims are the  
subject of the Hearing may participate by going to the United  
States District Court for the District of Puerto Rico, 150 Carlos  
Chardón Street, Federal Building, San Juan, Puerto Rico 00918-**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Responses:

A. Response to Three Hundred Sixty-Second Omnibus Objection to Claims, filed by Maira Feliciano Rosado (Claim No. 10547) [Case No. 17-3283, ECF No. 18290] (Response Form submitted, claimant will attend)

Replies, Joinders & Statements:

A. Reply of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Response Filed by Claimant Maira Feliciano Rosado [ECF No. 18290] to the Three Hundred Sixty-Second Omnibus Objection (Substantive) to Misclassified Claims [Case No. 17-3283, ECF No. 19984]

Related Documents:

A. Motion requesting extension of time to file a response, filed by Maira Feliciano Rosado [Case No. 17-3283, ECF No. 18289]

B. Motion in objection and to be heard at the December 2021 hearing, filed by Maira Feliciano Rosado [Case No. 17-3283, ECF No. 19270]

C. Order finding as moot motion requesting extension of time and motion in objection and to be heard at the December 2021 hearing [Case No. 17-3283, ECF No. 19382]

D. Motion Submitting Certified Translations in Connection with Docketed Claim Objection Responses To Be Heard at the February 16-17, 2022 Adjourned Objection Hearing [Case No. 17-3283, ECF No. 19998-1]

Status: This matter is going forward.

Estimated Time Required: 15 minutes

Order and Number of Speakers: The names of counsel who intend to speak on this matter and time allocations for each party are listed below:

A. Debtors: Laura Stafford and Brian Rosen, 3 minutes

B. Objecting Parties: Maira Feliciano Rosado, *pro se*, 10 minutes

C. Debtors: Laura Stafford and Brian Rosen, 2 minutes

5. Three Hundred Thirty-Seventh Omnibus Objection to Claims. Three Hundred Thirty-Seventh Omnibus Objection (Non-Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Pension-Related Claims Asserted Against the Incorrect Debtor [Case No. 17-3283, ECF No. 17081]

Objection Deadline: July 19, 2021 at 4:00 p.m. (Atlantic Standard Time)

Three Hundred Sixty-Second Omnibus Objection to Claims. Three Hundred Sixty-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of

**IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS  
ARE SEEKING TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.**

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
Feliciano Rosado, Maria Ivet	179662	10/18/2021	Commonwealth of Puerto Rico	\$0.00
Treatment:	<b>Claim to be Disallowed</b>			
Reason:	<b>Proof of claim was not timely filed, as claimant filed the claim after the applicable deadline set by the Bar Date Orders.</b>			

**SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES  
SOLICITAN QUE SU RECLAMO SEA RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.**

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
Feliciano Rosado, Maria Ivet	179662	10/18/2021	Commonwealth of Puerto Rico	\$0.00
Tratamiento:	<b>Reclamo a ser desestimado</b>			
Base para:	<b>La Evidencia de Reclamo no se presentó a tiempo, ya que el Reclamante presentó el reclamo después de la fecha límite aplicable establecida en las Órdenes de Fecha Límite.</b>			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

Copias de la Objección global, y todos los escritos radicados en el marco de las causas conforme al Título III, están disponibles, de manera gratuita, en <https://cases.primeclerk.com/puertorico>. Si tiene alguna pregunta, comuníquese con Prime Clerk LLC llamando al (844) 822-9231 (número gratuito para Estados Unidos y Puerto Rico) o (646) 486-7944 (para llamadas desde el extranjero), disponible entre las 10:00 a.m. y las 07:00 p.m. (AST) (hablamos español).

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LEGAL NOTICE ENCLOSED. DIRECT TO ATTENTION OF ADDRESSEE OR PRESIDENT/GENERAL COUNSEL.

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**U.S. Bankruptcy Court**

**District of Puerto Rico**

**Notice of Electronic Filing**

The following transaction was received from Ramirez, Marian entered on 3/24/2022 at 2:17 PM AST and filed on 3/24/2022

**Case Name:** COMMONWEALTH OF PUERTO RICO and Puerto Rico Public Buildings Authority (PBA)  
**Case Number:** 17-03283-LTS9  
**Document Number:** 20437

**Docket Text:**

ORDER CONCERNING [20359] APPLICATION FILED BY MAIRA I. FELICIANO ROSADO re: [20358] Notice of Appeal. Signed by Judge Laura Taylor Swain on 3/24/2022. (mr) s/c sent to Feliciano Rosado.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO et  
al.Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

ORDER CONCERNING APPLICATION FILED BY MAIRA I. FELICIANO ROSADO

The Court has received and reviewed the *Application to Proceed in District Court Without Prepaying Fees or Costs* (Docket Entry No. 20359 in Case No. 17-3283, the “Motion”), filed by Maira I. Feliciano Rosado, which the Court deems to be a motion for permission to proceed in forma pauperis with respect to Ms. Feliciano Rosado’s appeal of the Court’s ruling reclassifying proof of claim no. 10547 (the “Proof of Claim”) as a general unsecured claim. (See Docket Entry No. 20358 in Case No. 17-3283, the “Notice of Appeal”).

Ms. Feliciano Rosado’s Proof of Claim form asserts that her claim is entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9) and is secured in whole or in part by a lien on property. At the February 16, 2022, hearing concerning the Debtors’ objections to certain proofs of claim, the Court made the following ruling concerning the proof of claim filed by Ms. Feliciano Rosado:

I have reviewed the written submissions, and listened very carefully to everything that has been said today. I am terribly sorry to hear

<sup>1</sup>

The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

what Ms. Feliciano-Rosado has been going through, and her concerns about her son, and the custody matters, and the treatment of the child-custody payments. Those are not matters that are properly before the Court today. What is before the Court today is the question of whether the claim that Ms. Feliciano-Rosado has filed in these Title III proceedings is entitled to priority payment classification, either because it concerns a sale of goods to the Commonwealth within a certain period of time, or because it is backed by security, money, or property set aside to pay that claim specially. Neither of those necessary facts is established with respect to this claim. Therefore, the Court sustains the 362nd Omnibus Objection as to claim no. 10547 filed by Maira I. Feliciano-Rosado. That claim is reclassified as a general unsecured claim, and it will be considered and evaluated for payment and validity along with other general unsecured claims.

(Feb. 16, 2022, Hr'g Tr. 20:3-21, Docket Entry No. 20164 in Case No. 17-3283.) The Court has reviewed the Motion and the Notice of Appeal, and nothing therein identifies any non-frivolous argument on appeal of the Court's February 16, 2022, ruling. Accordingly, the Court certifies that Ms. Feliciano Rosado's appeal is not taken in good faith. See 28 U.S.C. § 1915(a)(3) ("An appeal may not be taken in forma pauperis if the trial court certifies in writing that it is not taken in good faith."); DuLaurence v. Telegen, No. 15-1537, 2016 WL 10454553, at \*1 (1st Cir. Nov. 30, 2016) ("Good faith for purposes of § 1915(a)(3) is judged by an objective standard; i.e., whether the litigant 'seeks appellate review of any issue not frivolous.'") (quoting Coppedge v. United States, 369 U.S. 438, 445 (1962)). The Motion is therefore denied.

This Order resolves Docket Entry No. 20359 in Case No. 17-3283.

SO ORDERED.

Dated: March 24, 2022

/s/ Laura Taylor Swain  
LAURA TAYLOR SWAIN  
United States District Judge

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Maira I. Feliciano Rosado  
Calle Elena Segarra #154, El Mani  
Mayaguez, PR 00682-3987

**U.S. Bankruptcy Court****District of Puerto Rico****Notice of Electronic Filing**

The following transaction was received from Ramirez, Marian entered on 5/5/2022 at 8:46 AM AST and filed on 5/5/2022

**Case Name:** COMMONWEALTH OF PUERTO RICO and Puerto Rico Public Buildings Authority (PBA)  
**Case Number:** 17-03283-LTS9  
**Document Number:** 20677

**Docket Text:**

ORDER CONCERNING [20664] MOTION FILED BY MAIRA I. FELICIANO ROSADO. The Motion is denied without prejudice to renewal in English. Signed by Judge Laura Taylor Swain on 5/5/2022. (mr) s/c sent to Feliciano Rosado.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

—x—

In re:

PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO  
et al.

(Jointly Administered)

Debtors.<sup>1</sup>

—x—

ORDER CONCERNING MOTION FILED BY  
MAIRA I. FELICIANO ROSADO (DOCKET ENTRY NO. 20664)

The Court has received and reviewed the motion dated May 2, 2022 (Docket Entry No. 20664 in Case No. 17-3283) (the “Motion”), filed entirely in the Spanish language by Maira I. Feliciano Rosado (the “Movant”), which appears to request that the Court reconsider the oral ruling issued at the February 16, 2022, claims objection hearing concerning Proof of Claim No. 10547, filed by Movant.

The Motion is written in the Spanish language, and no English language translation was provided. The United States Code provides that all proceedings in the United States District Court for the District of Puerto Rico must be conducted in English. See 48 U.S.C. § 864. See also L.Cv.R. 5(c) (“All documents not in the English language which are presented

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

7 de Mayo de 2022

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**Maira I. Feliciano Rosado  
Calle Elena Segarra #154  
Sector El Maní  
Mayaguez, PR 00682**

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# United States Court of Appeals For the First Circuit

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No. 22-1193

IN RE: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE COMMONWEALTH OF PUERTO RICO; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE PUERTO RICO SALES TAX FINANCING CORPORATION, a/k/a Cofina; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA); THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE OF THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY,

Debtors,

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MAIRA I. FELICIANO ROSADO,

Claimant - Appellant,

v.

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE COMMONWEALTH OF PUERTO RICO; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE OF THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY,

Debtors - Appellees.

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**ORDER OF COURT**

Entered: May 11, 2022  
Pursuant to 1st Cir. R. 27.0(d)

Claimant-Appellant Maira I. Feliciano Rosado filed a notice of appeal (No. 20358) in Title III case No. 3:17-bk-03283-LTS (D.P.R.) challenging the Title III court's February 16, 2022 hearing decision to reclassify claim No. 10547 as a general unsecured claim (Nos. 20164, 20167), as well as appears to challenge the Financial Oversight and Management Board for Puerto Rico's 414th omnibus objection (No. 20040) listing claim No. 179662 as an untimely claim. Upon review of the record, it appears that this court may not have jurisdiction to consider this appeal as the February 16, 2022 hearing decision to reclassify claim No. 10547 as a general unsecured claim may not be a final, immediately appealable decision. See 48 U.S.C. § 2166(e); In re Perry, 391 F.3d 282, 285 (1st Cir. 2004) (stating that an order must finally dispose of all the issues pertaining to the discrete dispute); see also Giles World Marketing, Inc. v. Boekamp Mfg., Inc., 787 F.2d 746, 748 (1st Cir. 1986) (holding that a decision allowing the filing of a proof of claim does not conclusively determine the discrete dispute as it neither allowed the claim nor determined the amount owed). Further, it appears the 414th omnibus objection remains pending as to claim No. 179662. 48 U.S.C. § 2166(e) (permitting appeals from decisions, orders, and judgments entered by the district court).

The appellant is ordered to move for voluntary dismissal of the appeal pursuant to Fed. R. App. P. 42(b), or to show cause, in writing, why this appeal should not be dismissed for lack of jurisdiction. The failure to take action by **May 25, 2022**, will lead to dismissal of the appeal for lack of diligent prosecution. 1st Cir. R. 3.0(b).

By the Court:

Maria R. Hamilton, Clerk

cc: Wandymar Burgos-Vargas, Hermann D. Bauer-Alvarez, Timothy W. Mungovan, Donald B. Verrilli Jr., Susana I. Penagaricano Brown, Carla Garcia-Benitez, Ubaldo M. Fernandez, Michael R. Hackett, Stephen L. Ratner, Margaret Antinori Dale, Ricardo Burgos-Vargas, Mark David Harris, Martin J. Bienenstock, Ehud Barak, Laura E. Stafford, Michael Luskin, Stephan E. Hornung, Chad Goldér, Julia D. Alonzo, Michael A. Firestein, Paul V. Possinger, Lary Alan Rappaport, Steven O. Weise, Ginger D. Anders, William D. Dalsen, Adele M. El-Khoury, Jeffrey W. Levitan, Kevin J. Perra, Jennifer L. Roche, Brian S. Rosen, Rachel G. Miller Ziegler, Guy Brenner, Gabriel A. Miranda-Rivera, Juan Carlos Ramirez-Ortiz, Luis Francisco Del-Valle-Emmanuelli, Chantel L. Febus, Maja Zerjal, Raul Castellanos-Malave, Ralph C. Ferrara, Ann M. Ashton, Arturo Diaz-Angueira, Joseph P. Davis III, Katiuska Bolanos-Lugo, Maria Jennifer DiConza, Mariana Muniz-Lara, Nelson Robles Diaz, Monsita Lecaroz-Arribas, Fernando Agrait, Sergio A. Ramirez-de-Arellano, Cynthia Torres, Maira Ivet Feliciano Rosado, Aurivette Deliz-Delgado

**22-1193**

Maira Ivet Feliciano Rosado  
Calle Elena Segarra #154, El Mani  
Mayaguez, PR 00682-6123

Recibido - 14 de mayo de 2022

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0068246123

# United States Court of Appeals For the First Circuit

No. 22-1193

IN RE: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE COMMONWEALTH OF PUERTO RICO; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE PUERTO RICO SALES TAX FINANCING CORPORATION, a/k/a Cofina; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA); THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE OF THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY,

Debtors,

MAIRA I. FELICIANO ROSADO,

Claimant - Appellant,

v.

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE COMMONWEALTH OF PUERTO RICO; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE FOR THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY; THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE OF THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY,

Debtors - Appellees.

## ORDER OF COURT

Entered: May 11, 2022

Pursuant to 1st Cir. R. 27.0(d)

In an order entered on March 24, 2022, in No. 3:17-bk-03283-LTS (D.P.R.), the district court certified pursuant to 28 U.S.C. § 1915(a)(3) and Fed. R. App. P. 24(a)(3)(A) that this appeal is not taken in good faith. If claimant-appellant Maira I. Feliciano Rosado seeks to challenge the district court's certification, she must file a motion pursuant to Fed. R. App. P. 24(a)(5) on or before **June 10, 2022**.

Accordingly, on or before **June 10, 2022**, appellant must either pay the \$505 filing fee to the district court or file a motion in this court pursuant to Fed. R. App. P. 24(a)(5). Failure to take either action will lead to dismissal of the appeal for lack of prosecution. See 1st Cir. R. 3.0(b).

By the Court:

Maria R. Hamilton, Clerk

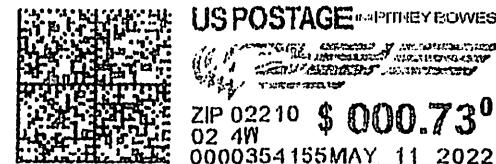
cc: Wandymar Burgos-Vargas, Hermann D. Bauer-Alvarez, Timothy W. Mungovan, Donald B. Verrilli Jr., Susana I. Penagaricano Brown, Carla Garcia-Benitez, Ubaldo M. Fernandez, Michael R. Hackett, Stephen L. Ratner, Margaret Antinori Dale, Ricardo Burgos-Vargas, Mark David Harris, Martin J. Bienenstock, Ehud Barak, Laura E. Stafford, Michael Luskin, Stephan E. Hornung, Chad Golder, Julia D. Alonzo, Michael A. Firestein, Paul V. Possinger, Lary Alan Rappaport, Steven O. Weise, Ginger D. Anders, William D. Dalsen, Adele M. El-Khoury, Jeffrey W. Levitan, Kevin J. Perra, Jennifer L. Roche, Brian S. Rosen, Rachel G. Miller Ziegler, Guy Brenner, Gabriel A. Miranda-Rivera, Juan Carlos Ramirez-Ortiz, Luis Francisco Del-Valle-Emmanuelli, Chantel L. Febus, Maja Zerjal, Raul Castellanos-Malave, Ralph C. Ferrara, Ann M. Ashton, Arturo Diaz-Angueira, Joseph P. Davis III, Katiuska Bolanos-Lugo, Maria Jennifer DiConza, Mariana Muniz-Lara, Nelson Robles Diaz, Monsita Lecaroz-Arribas, Fernando Agrait, Sergio A. Ramirez-de-Arellano, Cynthia Torres, Maira Ivet Feliciano Rosado, Aurivette Deliz-Delgado

**22-1193**

Maira Ivet Feliciano Rosado  
Calle Elena Segarra #154, El Mani  
Mayaguez, PR 00682-6123

OFFICE OF THE CLERK  
UNITED STATES COURT OF APPEALS  
JOHN JOSEPH MOAKLEY U.S. COURTHOUSE  
1 COURTHOUSE WAY - SUITE 2500  
BOSTON, MASSACHUSETTS 02210  
OFFICIAL BUSINESS

Recibido - 14 de mayo de 2022



0068236123

Gobierno de Puerto Rico

Government of Puerto Rico

Departamento de la Familia

Department of the Family

ADMINISTRACIÓN PARA EL SUSTENTO DE MENORES  
ADMINISTRATION FOR CHILD SUPPORT ENFORCEMENT

Región de HUMACAO

Region of HUMACAO

Núm. del Caso: 0516701

Núm. del Caso  
Intergubernamental:

FELICIANO ROSADO MAIRA (45)

## OBJECIÓN A LA NOTIFICACIÓN DE INTENCIÓN DE REFERIR LOS CASOS EXCLUIDOS DEL QUE SE EJECUTEN ALGUNOS DE LOS REMEDIOS DE CUMPLIMIENTO

Al Administrador:

Comparece Maira I. Feliciano, Persona No Custodia en el caso señalado arriba, cuyo número de seguro social es XXX-XX-4877, quien EXPONE, ALEGA Y SOLICITA:

PRIMERO: El día 13 de abril de 2022, recibí una carta de "Notificación sobre intención de referir los casos excluidos del que se ejecuten algunos de los remedios de cumplimiento".

SEGUNDO: En esa notificación se me indicó que en mi caso se venció el término para evaluar y atender las controversias presentes en éste y, por consiguiente, mi nombre y datos personales van a ser referidos para que se ejecuten algunos de los mecanismos de cumplimiento de la pensión alimentaria.

TERCERO: Por la presente, objeto el referido, por la razón siguiente:

Existe un error de hecho Mi hijo está bajo cruel Desaparición Forzada (2013-2022)

Existe controversia por la deuda o la cantidad adeudada ante la Administración de Sustento de Menores

Existe controversia por la deuda o la cantidad adeudada ante el Tribunal General de Justicia

No soy el alimentante deudor o la alimentante deudora

Me acogí a la Ley de Quiebras federal

Soy participante del Proyecto IMPULSO

En Mayagüez, Puerto Rico, hoy 13 de abril de 2022

Maira I. Feliciano Rosado  
Nombre (Letra de molde)

Calle Elena Segarra #154 El Maní  
Dirección Postal Mayagüez, P.R. 00682-6123

Firma



(787) 242-1302  
Teléfono

*¡Devuélvame!  
a mi hijo. Dígame,  
a qué lugar de los  
Estados Unidos le  
están enviando el  
dinero de su pensión  
alimentaria.*

Rev. 07/21  
(SM1501)

27 de abril de 2018  
27.4.2018

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO / TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS PARA EL  
DISTRITO DE PUERTO RICO

Fill in this information to identify the case (Select only one Debtor per claim form). /  
Llene esta información para identificar el caso (seleccione sólo un deudor por formulario de reclamación).

<input checked="" type="checkbox"/> Commonwealth of Puerto Rico El Estado Libre Asociado de Puerto Rico	Case No. 17-bk-03283	Petition Date: May 3, 2017
<input type="checkbox"/> Puerto Rico Sales Tax Financing Corporation (COFINA) La Corporación del Fondo de Interés Apremiante de Puerto Rico	Case No. 17-bk-03284	Petition Date: May 5, 2017
<input type="checkbox"/> Puerto Rico Highways and Transportation Authority La Autoridad de Carreteras y Transportación de Puerto Rico	Case No. 17-bk-03567	Petition Date: May 21, 2017
<input checked="" type="checkbox"/> Employees Retirement System of the Government of the Commonwealth of Puerto Rico El Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico	Case No. 17-bk-03566	Petition Date: May 21, 2017
<input type="checkbox"/> Puerto Rico Electric Power Authority La Autoridad de Energía Eléctrica de Puerto Rico	Case No. 17-bk-04780	Petition Date: July 2, 2017

Debtor [DebtorName] has listed your claim in their Creditor List in Schedule [CreditorList] as a [CUD] claim in an \$[ScheduleAmount] amount. You must timely file a proof of claim or be forever barred from participating or sharing in any distribution or being treated as a claim for purposes of voting or distribution.

El deudor [DebtorName] ha listado su reclamación en la lista de acreedores en el Schedule [CreditorList] como un reclamo [CUD] por un monto de \$ [ScheduleAmount]. Debe presentar una prueba de reclamación oportunamente o se le prohibirá por siempre participar o compartir en cualquier distribución o ser tratado como un reclamo para fines de votación o distribución.

## Modified Official Form 410 / Formulario Oficial 410 Modificado

### Proof of Claim / Evidencia de reclamación

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a Title III case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy or subject to confidentiality on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

Lea las instrucciones antes de completar este formulario. Este formulario está diseñado para realizar una reclamación de pago en un caso en virtud del Título III. No utilice este formulario para solicitar el pago de un gasto administrativo que no sea una reclamación que reúna los requisitos para ser tratada como prioridad administrativa conforme al Título 11 § 503(b) (9) del U.S.C. Ese tipo de solicitud debe realizarse de conformidad con el Título 11 § 503 del U.S.C.

Quienes presenten la documentación deben omitir o editar información que reúna los requisitos para ser tratada con privacidad o confidencialidad en este formulario o en cualquier otro documento adjunto. Adjunte copias editadas de cualquier otro documento que respalde la reclamación, tales como pagarés, órdenes de compra, facturas, balances detallados de cuentas en funcionamiento, contratos, resoluciones judiciales, hipotecas y acuerdos de garantías. No adjunte documentos originales, ya que es posible que los documentos adjuntos se destruyan luego de analizarlos. En caso de que los documentos no estén disponibles, explique los motivos en un anexo.

Fill in all the information about the claim as of the Petition Date.

Complete toda la información acerca de la reclamación a la fecha en la que se presentó el caso.

#### Part 1 / Parte 1

#### Identify the Claim / Identificar la reclamación

1. Who is the current creditor?

¿Quién es el acreedor actual?

Maira I. Feliciano Rosado

Name of the current creditor (the person or entity to be paid for this claim)  
Nombre al acreedor actual (la persona o la entidad a la que se le pagará la reclamación)

Other names the creditor used with the debtor  
Otros nombres que el acreedor usó con el deudor

2. Has this claim been acquired from someone else?	<input type="checkbox"/> No / No <input type="checkbox"/> Yes. From whom? Sí. ¿De quién? <u>Pleito de Clase - 159 D.P.R 47 (2003)</u>
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? ¿A dónde deberían enviarse las notificaciones al acreedor? Where should payments to the creditor be sent? (if different) ¿A dónde deberían enviarse los pagos al acreedor? (En caso de que sea diferente)
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<u>Maira I. Feliciano Rosado</u> Name / Nombre
¿A dónde deberían enviarse las notificaciones al acreedor?	<u>Calle Elena Segarra #154 Sector El Maní</u> Number / Número Street / Calle
Norma federal del procedimiento de quiebra (FRBP, por sus siglas en inglés) 2002(g)	<u>Mayagüez, P.R. 00682</u> City / Ciudad State / Estado ZIP Code / Código postal
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Sí. Número de reclamación en el registro de reclamaciones judiciales (en caso de saberlo) Filed on / Presentada el _____ (MM/DD/YYYY) / (DD/MM/AAAA)
5. Do you know if anyone else has filed a proof of claim for this claim?	<input type="checkbox"/> No / No <input checked="" type="checkbox"/> Yes. Who made the earlier filing? Sí. ¿Quién hizo la reclamación anterior? <u>Sra. Aracelis Rivera</u>

Part 2 / Parte 2:

Give Information About the Claim as of the Petition Date

Complete toda la información acerca de la reclamación desde la fecha en la que se presentó el caso.

6. Do you have a claim against a specific agency or department of the Commonwealth of Puerto Rico?	<input type="checkbox"/> No / No <input checked="" type="checkbox"/> Yes. Identify the agency or department and contact name. (A list of Commonwealth of Puerto Rico agencies and departments is available at: <a href="https://cases.primeclerk.com/puertorico/">https://cases.primeclerk.com/puertorico/</a> ) Sí. Identifique el organismo o departamento y nombre del representante. (Una lista de agencias y departamentos del Estado Libre Asociado de Puerto Rico está disponible en: <a href="https://cases.primeclerk.com/puertorico/">https://cases.primeclerk.com/puertorico/</a> ).
7. Do you supply goods and / or services to the government?	<input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. Provide the additional information set forth below / Sí. Proporcionar la información adicional establecida a continuación: Vendor / Contract Number   Número de proveedor / contrato: _____ List any amounts due after the Petition Date (listed above) but before June 30, 2017: Anote la cantidad que se le debe después de la fecha que se presentó el caso (mencionados anteriormente), pero antes del 30 de junio de 2017 \$ _____

8. How much is the claim? \$ \_\_\_\_\_

¿Cuál es el importe de la reclamación?

(No se)

Does this amount include interest or other charges?

¿Este importe incluye intereses u otros cargos?

No / No

Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

Sí. Adjunte un balance con intereses detallados, honorarios, gastos u otros cargos exigidos por la Norma de Quiebras 3001(c)(2)(A).

9. What is the basis of the claim?

¿Cuál es el fundamento de la reclamación?

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.

Por ejemplo: Venta de bienes, préstamo de dinero, arrendamiento, prestación de servicios, lesiones personales u homicidio culposo, o tarjetas de crédito. Adjunte copias editadas de cualquier documento que respalte la reclamación conforme a lo exigido por la Norma de Quiebras 3001(c). Limite la divulgación de información que reúne los requisitos para ser tratada con privacidad, tal como información sobre atención médica.

## Devolución de cuotas retenidas ilegalmente.

10. Is all or part of the claim secured?

¿La reclamación está garantizada de manera total o parcial?

No / No

Yes. The claim is secured by a lien on property.

Sí. La reclamación está garantizada por un derecho de retención sobre un bien.

Nature of property / Naturaleza del bien:

Motor vehicle / Vehículos

Other. Describe:

Otro. Describir:

Retención en contra de mi voluntad

Basis for perfection / Fundamento de la realización de pasos adicionales: Nunca firmé ningún acuerdo de afiliación con la Federación de Maestros de P.R.

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Adjunte copias editadas de documentos, si los hubiere, que demuestre la realización de pasos adicionales para hacer valer un derecho de garantía (por ejemplo, una hipoteca, un derecho de retención, un certificado de propiedad, una declaración de financiamiento u otro documento que demuestre que se ha presentado o registrado un derecho de retención).

Value of property / Valor del bien: \$ \_\_\_\_\_

Amount of the claim that is secured /  
Importe de la reclamación que está garantizado: \$ \_\_\_\_\_

Amount of the claim that is unsecured /

Importe de la reclamación que no está garantizado: \$ \_\_\_\_\_

(The sum of the secured and unsecured amounts should match the amount in line 7.)

(La suma del importe garantizado y no garantizado debe coincidir con el importe de la línea 7.)

Amount necessary to cure any default as of the Petition Date /  
Importe necesario para compensar toda cesación de pago a la fecha que se presentó el caso : \$ \_\_\_\_\_

Annual Interest Rate (on the Petition Date)

Tasa de interés anual (cuando se presentó el caso) %

Fixed / Fija

Variable / Variable

11. Is this claim based on a lease?

¿Esta reclamación está basada en un arrendamiento?

No / No

Yes. Amount necessary to cure any default as of the Petition Date.

Sí. Importe necesario para compensar toda cesación de pago a partir de la que se presentó el caso \$ \_\_\_\_\_



Presentment Date: May 27, 2022

Objection Deadline: May 26, 2022 at 4:00 p.m. (AST)

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth.

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**NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING THE FOUR  
HUNDRED THIRTY-FIFTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE  
COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR WHICH THE  
COMMONWEALTH IS NOT LIABLE (ECF NO. 20490)**

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PLEASE TAKE NOTICE that, on May 19, 2022, the Commonwealth of Puerto Rico (the “Commonwealth” or the “Debtor”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Commonwealth pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and*

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Economic Stability Act (“PROMESA”),<sup>2</sup> hereby submits a *Notice of Presentment of Proposed Order Granting the Four Hundred Thirty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for Which The Commonwealth Is Not Liable* (the “Notice”).*

**PLEASE TAKE FURTHER NOTICE** that, on April 1, 2022, the Commonwealth, by and through the Oversight Board, filed the *Four Hundred Thirty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for Which The Commonwealth Is Not Liable* [ECF No. 20490] (the “Four Hundred Thirty-Fifth Omnibus Objection”).

**PLEASE TAKE FURTHER NOTICE** that the Four Hundred Thirty-Fifth Omnibus Objection was scheduled for hearing on May 18, 2022.

**PLEASE TAKE FURTHER NOTICE** that any party against whom the Four Hundred Thirty-Fifth Omnibus Objection was served, or any other party to the Debtors’ Title III cases who objected to the relief sought therein, was required to file and serve a response to the Four Hundred Thirty-Fifth Omnibus Objection with the clerk’s office of the United States District Court for the District of Puerto Rico by 4:00 p.m. (Atlantic Time) on May 2, 2022 (the “Response Deadline”).

**PLEASE TAKE FURTHER NOTICE** that, as set forth in Exhibit C to the Four Hundred Thirty-Fifth Omnibus Objection, if no response was filed by the Response Deadline, the Four Hundred Thirty-Fifth Omnibus Objection “will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise.” Ex. C to Four Hundred Thirty-Fifth Omnibus Objection, ECF No. 20490-4, at 3.

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<sup>2</sup> PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

**PLEASE TAKE FURTHER NOTICE** that, according to this Court's *Sixteenth Amended Case Management Procedures* [ECF No. 20190-1]) (the "Case Management Procedures"), the Court may enter an order granting a request for relief without a hearing upon receipt of a certificate of no objection ("CNO", as defined by the Case Management Procedures). *See* Case Management Procedures, Section III, paragraph P.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with the Case Management Procedures, the undersigned hereby certifies that this Notice is filed not less than forty-eight (48) hours after the expiration of the Response Deadline.

**PLEASE TAKE FURTHER NOTICE** that the undersigned hereby certifies that counsel for the Oversight Board has reviewed, not less than forty-eight (48) hours after expiration of the Response Deadline, (i) the docket in the above-captioned case, (ii) mailings received by Kroll Restructuring Associates, LLC ("Kroll"), (iii) mailings received by the Oversight Board, and (iv) mailings received by counsel for the Official Committee of Unsecured Creditors of the Commonwealth of Puerto Rico (the "UCC") and forwarded to counsel for the Oversight Board (collectively, the "Responses") and, to the best of the undersigned's knowledge, no applicable objection, responsive pleading, or request for a hearing with respect to the Four Hundred Thirty-Fifth Omnibus Objection has been submitted.

**PLEASE TAKE FURTHER NOTICE** that, attached hereto as Exhibit A is a proposed order (the "Proposed Order") granting the relief requested in the Four Hundred Thirty-Fifth Omnibus Objection.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Paragraph III.H of the Case Management Procedures, "the presentment of a proposed order for administrative relief must be filed and served at least seven (7) calendar days before the presentment date, and Objections

thereto must be filed and served at least one (1) calendar day before the presentment date," and accordingly, unless a written objection to the Proposed Order is filed with the Court by 4:00 p.m. (Atlantic Time) on May 19, 2022, the relief requested in the Four Hundred Thirty-Fifth Omnibus Objection shall be deemed unopposed, and the Proposed Order may be entered without a further hearing.

**PLEASE TAKE FURTHER NOTICE** that, copies of all documents filed in these Title III cases are available (a) free of charge by visiting <https://cases.ra.kroll.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court's website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

Dated: May 19, 2022  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Ricardo Burgos Vargas

Ricardo Burgos Vargas  
USDC No. 218210  
**A&S LEGAL STUDIO, PSC**  
434 Ave. Hostos  
Tel: (787) 751-6764  
Fax: (787) 763-8260

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)  
Brian S. Rosen (*pro hac vice*)  
**PROSKAUER ROSE LLP**  
Eleven Times Square  
New York, NY 10036  
Tel: (212) 969-3000  
Fax: (212) 969-2900

*Attorneys for the Financial  
Oversight and Management Board for  
Puerto Rico, as representative of the  
Commonwealth of Puerto Rico*

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth.**

ORDER GRANTING FOUR HUNDRED THIRTY-FIFTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR  
WHICH THE COMMONWEALTH IS NOT LIABLE

Upon the *Four Hundred Thirty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for Which The Commonwealth Is Not Liable* [ECF No. 20490] (the “Four Hundred Thirty-Fifth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated April 1, 2022, for entry of an order disallowing in their certain claims filed against the Commonwealth, as more fully set forth in the Four Hundred Thirty-

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Thirty-Fifth Omnibus Objection.

Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Thirty-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Thirty-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; the claims identified in Exhibit A to the Four Hundred Thirty-Fifth Omnibus Objection (collectively, the "Claims to Be Disallowed") having been found to be claims for which the Commonwealth is not liable; and the Court having determined that the relief sought in the Four Hundred Thirty-Fifth Omnibus Objection is in the best interest of the Commonwealth and its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Thirty-Fifth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Thirty-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 20490 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

---

Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Thirty-Fifth Omnibus Objection**

Four Hundred Thirty-Fifth Omnibus Objection  
 Exhibit A - Claims to Be Disallowed

NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1 DIAZ RAMIREZ, LUIS RR 1 BOX 15057 MANATI, PR 00674	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	23026	\$ 3,458.00
Reason: Proof of claim purports to assert liabilities associated with unpaid unemployment benefits from the Department of Labor (DOL). The books and records of the DOL, however, show that the claimant was deemed ineligible in 2016 and, upon appeal within the DOL, the DOL confirmed the claimant's ineligibility. Claimant did not appeal this decision and the claim and/or supporting documentation do not provide any further basis for asserting liability against the Commonwealth or any other Title III Debtor.					
2 FELICIANO ROSADO, MAIRA I CALLE ELENA SEGARRA #154 SECTOR EL MANI MAYAGUEZ, PR 00682	5/3/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	10547	Undetermined*
Reason: Proof of claim purports to assert liabilities associated the Commonwealth of Puerto Rico, but the claim and/or supporting documentation do not provide any basis for asserting liabilities against the Commonwealth of Puerto Rico or any other Title III Debtor.					
3 GOLDMAN SACHS BANK USA (F/K/A GOLDMAN SACHS CAPITAL MARKETS, L.P.) NICK VAN DUSEN(GOLDMAN SACHS BANK USA) 200 WEST STREET NEW YORK, NY 10282-2198	5/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	44253	\$ 3,606,830.47*
Reason: Proof of Claim and supporting documentation assert liabilities associated with an interest rate swap agreement between the claimant and COFINA. Pursuant to the Amended Order and Judgment Confirming the Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation [ECF No. 5055] (the "COFINA Plan") and the Stipulation and Order with Respect to (A) Rejection of Swap Agreement Between Goldman Sachs Bank USA and Puerto Rico Sales Tax Financing Corporation, (B) Relief from Stay With Respect to Cash Collateral and (C) Allowance and Treatment of Claim [ECF No. 576, Case No. 17-3284], the claimant's agreement with COFINA was rejected and its claim against COFINA was treated pursuant to the COFINA Plan. Following confirmation of the COFINA Plan and approval of the settlement of the Commonwealth-COFINA Dispute, the claim and supporting documentation do not provide a basis for asserting liability against the Commonwealth of Puerto Rico.					
4 RODRÍGUEZ NÚÑEZ, JESSICA PO BOX 361191 SAN JUAN, PR 00936-1191	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	28239	\$ 1,000.00*
Reason: Proof of claim purports to assert liabilities associated with a Commonwealth program for reimbursing minor damage to vehicles caused by roads. The books and records of the office of Services to the Citizen within the Puerto Rico Department of Transportation and Public Works (DTOP) show, however, that the claimant did not properly execute and file a claim form within the required statutory period in order to be eligible for payment, and the period to file a claim has elapsed. The claim and supporting documentation do not provide any further basis for asserting liability against the Commonwealth or any other Title III Debtor.					
5 SANTIAGO MEDINA, MILDRED 18 HOLLY STREET CARTERET, NJ 07008	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25574	\$ 830.00
Reason: Claim to Be Disallowed purports to assert liability against the Commonwealth for commissions allegedly owed to claimant for the sale of insurance, but such liability would lie, if at all, with the claimant's employer, and not the Commonwealth.					
					TOTAL \$ 3,612,118.47*

## Formulario 480.7C

Form  
Rev. 08.21

GOBIERNO DE PUERTO RICO - GOVERNMENT OF PUERTO RICO

Departamento de Hacienda - Department of the Treasury

DECLARACIÓN INFORMATIVA - PLANES DE RETIRO Y ANUALIDADES  
INFORMATIVE RETURN - RETIREMENT PLANS AND ANNUITIESAÑO CONTRIBUTIVO:  
TAXABLE YEAR: 2021 Enmendado - Amended: \_\_\_\_\_Número de Confirmación de Radicación Electrónica  
Electronic Filing Confirmation Number**F0060077056**Indique propósito - Indicate purpose  
 Aportaciones Contributions  Distribuciones Distributions  Ambos BothINFORMACIÓN DE DELEGADORES PAYER'S INFORMATION  
Nº de Identificación Patronal - Employer Identification No.INFORMACIÓN DE QUIEN RECIBE EL PAGO PAYER'S INFORMATION  
Selección un encasillado - Select one box:  
 Residente Resident  No Resident Ciudadano del EU. No Resident U.S. Citizen  No Resident Extranjero Nonresident AlienINFORMACIÓN DEL PLAN PLAN'S INFORMATION  
Nº de Identificación Patronal - Employer Identification No.

Nombre - Name

## ADMINISTRACIÓN SISTEMAS DE RETIRO

Dirección - Address

PO BOX 42003

SAN JUAN PR

00940-2003

Código Postal - Zip Code

Nº de Teléfono - Telephone No.

Correo Electrónico - E-mail

Nº de Identificación - Identification No.

Nombre del Plan - Name of Plan

Nombre - Name  
MAIRA FELICIANO ROSADONombre de quien auspicia el plan - Plan sponsor's name  
ADMINISTRACIÓN SISTEMAS DE RETIRO

Dirección - Address

MAYAGUEZ PR 00682-6123

Código Postal - Zip Code

Fecha en que comenzó a recibir la pensión;  
Date on which you started to receive the pension:

Día/Day 4 Mes/Month 12 Año/Year 2014

Marque el encasillado correspondiente - Check the corresponding box:

Forma de Distribución: - Form of Distribution:

 Total Lump Sum  Parcial Partial  Pagos Periódicos Periodic Payments Gubernamental Governmental

Tipo de Plan o Anualidad: - Plan or Annuity Type:

 Privado Calificado Qualified Private  No Calificado Non Qualified  Anualidad Fija Fixed Annuity  Anualidad Variable Variable Annuity

Descripción / Description

Cantidad / Amount

Distribuciones / Distributions

1. Aportación Vía Transferencia  
Rollover Contribution

0.00

16. Cantidad Distribuida  
Amount Distributed

5,905.68

2. Distribución Vía Transferencia  
Rollover Distribution

0.00

17. Cantidad Tributable  
Taxable Amount

5,685.68

3. Costo de la Pensión o Anualidad:  
Cost of Pension or Annuity

26,390.77

18. Cantidad sobre la cual se Pago por Adelantado  
bajo las Secciones 1023.21, 1081.01(b)(8) o 1012D(b)(5).  
Amount over which a Prepayment was Made under  
Sections 1023.21, 1081.01(b)(8) or 1012D(b)(5)

0.00

4. Fondo de Retiro Gubernamental  
Governmental Retirement Fund

0.00

19. Aportaciones Voluntarias  
After-Tax Contributions

0.00

5. Contribución Retenida sobre Pagos Periódicos de Planes  
Calificados o Gubernamentales - Tax Withheld from Periodic  
Payments of Qualified or Governmental Plans

0.00

20. Ingresos Exentos:  
Exempt Income

300.00

6. Contribución Retenida sobre una Distribución Total (20%)  
Tax Withheld from Lump Sum Distributions (20%)

0.00

21. Distribuciones por Razón de un Desastre Declarado  
por el Gobernador de Puerto Rico - Distributions for  
Reason of a Disaster Declared by the Governor of Puerto  
Rico

0.00

7. Contribución Retenida sobre una Distribución Total (10%)  
Tax Withheld from Lump Sum Distributions (10%)

0.00

A. Exentas  
Exempt

0.00

8. Contribución Retenida sobre Distribuciones de Planes  
No Calificados - Tax Withheld from Distributions of Non  
Qualified Plans

0.00

B. Tributables  
Taxable

0.00

9. Contribución Retenida sobre Otras Distribuciones de  
Planes Calificados (10%) - Tax Withheld from Other  
Distributions of Qualified Plans (10%)

0.00

C. Cantidad sobre la cual se Pago por Adelantado  
Amount over which a Prepayment was Made

0.00

10. Contribución Retenida sobre Anualidades  
Tax Withheld from Annuities

0.00

D. Aportaciones Voluntarias  
After-Tax Contributions

0.00

11. Contribución Retenida sobre Transferencia de un  
Plan Calificado a una Cuenta de Retiro Individual No  
Deductible - Tax Withheld from Rollover of a Qualified  
Plan to a Non Deductible Individual Retirement Account

0.00

E. Total (Suma líneas 21A a la 21D)  
Total (Add lines 21A through 21D)

0.00

12. Contribución Retenida sobre Distribuciones del  
Programa de Cuentas de Ahorro para el Retiro (10%)  
Tax Withheld from Distributions of the Retirement Savings  
Account Program (10%)

0.00

22. Contribución Retenida sobre Distribuciones por  
Razón de un Desastre Declarado por el Gobernador  
de Puerto Rico - Income Tax Withheld on Distributions  
for Reason of a Disaster Declared by the Governor of  
Puerto Rico

0.00

13. Contribución Retenida sobre Transferencia del  
Programa de Cuentas de Ahorro para el Retiro a Cuenta  
de Retiro Individual No Deductible (10%) - Tax Withheld  
from Rollover of the Retirement Savings Account Program  
to a Non Deductible Individual Retirement Account (10%)

0.00

23. Código de Distribución  
Distribution Code A  B14. Contribución Retenida sobre Distribuciones a No  
Residentes - Tax Withheld from Nonresident's Distributions

0.00

Razones para el Cambio  
Reasons for the Change15. Contribución Retenida sobre Otras Distribuciones  
Tax Withheld from Other Distributions

0.00

Número de Cuenta  
Account NumberNúmero de Control  
Control NumberNúmero de Control de la Declaración Informativa Original  
Control Number of Original Informative Return

4355

FECHA DE RADICACIÓN: 28 DE FEBRERO O 30 DE NOVIEMBRE, SEGÚN APLIQUE VEA INSTRUCCIONES - FILING DATE: FEBRUARY 28 OR NOVEMBER 30, AS APPLICABLE. SEE INSTRUCTIONS  
ENVÍE ELECTRÓNICAMENTE AL DEPARTAMENTO DE HACIENDA. ENTREGUE DOS COPIAS A QUIEN RECIBE EL PAGO. CONSERVE COPIA PARA SUS RECORDS.  
SEND TO DEPARTMENT OF THE TREASURY ELECTRONICALLY. DELIVER TWO COPIES TO PAYEE. KEEP COPY FOR YOUR RECORDS.

Gobierno de Puerto Rico  
592 - SISTEMA DE RETIRO MAESTRO-PENS

Grupo de Pago:	SM -Quincenal	Business Unit: PUERT
Desde:	03/01/2022	Aviso #: 9600835
Hasta:	03/15/2022	Fecha Aviso: 03/14/2022

MAIRA I FELICIANO ROSADO  
SECTOR EL MANI  
154 CALLE ELENA SEGARRA  
MAYAGUEZ, PR 00682  
SS: XXX-XX-4877

# Empleado: XXXXX4877  
Dept: 592180-INCAPACIDAD LEY 91 2004  
Lugar: INCAPACIDAD LEY 91 2004  
Titulo: Pensionado  
Sueldo: \$467.14 Monthly

DATA IMP:	Federal	PR
Estado Civil:	Married	Married
Concesiones:	0	39 + 99
Pct. Adcl.:		
Cant. Adcl.:		

DETALLE DE PAGO			DETALLE DE INGRESOS			DETALLE DE EGRESOS			DETALLE DE SALDOS		
Descripcion	Sueldo	Corriente	Horas	Ingresos	Horas	Ingresos	Corriente	Acumulado	Descripcion	Corriente	Acumulado
Pago de Salarios Regulares			233.57		390.00		1,167.85				
Total:		233.57		390.00		1,167.85			Total:	0.00	0.00
DETALLE DE INGRESOS									DETALLE DE EGRESOS		
Descripcion	Corriente	Acumulado	Descripcion	Corriente	Acumulado	Descripcion	Corriente	Acumulado			
			Garnishments	134.28	671.40	SM-Plan Medico ASES	0.00	200.00			
			AE-Asoc Emp ELA-Prest Regular	33.55	167.75						
			Ahorros-AEELA	7.01	35.05						
Total:	0.00	0.00	Total:	174.84	874.20	* Tributable					
Corriente:	233.57				0.00		174.84			58.73	
Acumulado:	1,167.85				0.00		874.20			293.65	
Balance Inicial:	0.0								Aviso #9600835		58.73
+ Acumulado:									Total:		58.73
- Utilizado:											
- Donada:											
+ Ajustes:											
Balance Final:	0.0										

MENSAJE:

Gobierno de Puerto Rico  
592 - SISTEMA DE RETIRO MAESTRO-PENS

Fecha  
03/14/2022

Aviso No.  
9600835

Cant. Deposito: \$58.73

A la  
Cuenta(s) De

MAIRA I FELICIANO ROSADO  
SECTOR EL MANI  
154 CALLE ELENA SEGARRA  
MAYAGUEZ, PR 00682

Tipo de Cuenta	Numero de Cuenta	Cant. Deposito
Checking		\$58.73
Total:		\$58.73

NO-NEGOCIABLE

Rodríguez-García and his mother, Mrs. Marta García, the life of my son, my life, and the home of my parents have become "a *public fishbowl*," without a right of intimacy, due to the scrutiny and malicious persecution of the State, causing us successive and continued damages and profound mental anguish due to the derision, unjust and accusatory state general suspicion raised around our family, and the significant undermining of my religious leadership and professional image, creating discrimination due to social condition, *López v. E.L.A.*, 2005 T.S.P.R. 102; *Rosario v. Toyota*, 2005 T.S.P.R. 154; without legal grounds or due process of law or equal protection under the law, pursuant to the Fifth and Fourteenth Amendments. Hence, we pray: **REMOVE THE STATE FROM OUR LIVES! REMOVE THE PERSECUTING COURT FROM MY HOME! GIVE US BACK OUR LIVES, PLEASE!**

H) That the names of all public officials of the Government of Puerto Rico against whom cause is found for intrinsic or extrinsic fraud on the court and/or for the commission of criminal offenses, be entered into the Registry of Corrupt Functionaries of the Commonwealth of Puerto Rico.

I) By virtue of the new **Law 246**, amending Article 2.006 of Law 201 of 2003, **The 2003 Judiciary Act of the Commonwealth of Puerto Rico**, "for the purposes of requiring that providing training on the subjects of child abuse and the protection of minors be an inherent part of the system of judicial education."<sup>18</sup> For which it is urgently requested that Judge Lynette Ortiz-Martínez, assigned to cases of family law, be trained in, "...a matter of the highest public policy which has always concerned the legislator," *Figueroa Hernández v. Del Rosario Cervoni*, 98 T.S.P.R. 158; regarding the

<sup>18</sup> Introduction to Law Number 246 of December 16, 2011, known as the "Law for the Safety, Well-being and Protection of Minors," amended, repealing Law 177 of 2003, known as the conocida como la "Comprehensive Law for the Well-being and Protection of Children."

seriousness and significance of the damages caused to a minor, such as my son, who she took from me since he was seven (7) years old, at a critical moment in the development and formation of his character, by tearing him from the arms of his mother in an unreasonable, arbitrary and capricious manner, and without legal grounds.

J) My eight (8) year old minor son, L.A.R.F., and I, Maira I. Feliciano-Rosado, seek protection in the just and human intention of the law to provide indemnization for damages caused to persons by means of sufficient and effective compensation, *Rojas v. Maldonado*, 68 D.P.R. 818 (1948); *Albemarle Paper Co. v. Moody*, 422 U.S. 405 (1975); *S.L.G. Rodríguez v. Nationwide*, 156 D.P.R. 614, 622 (2002). That the amounts awarded be adjusted by price levels as well as cost of living, *Benet v. Hernández*, 22 D.P.R. 494 (1915); *Rivera v. Martínez*, 26 D.P.R. 760 (1918); *Franco v. Martínez*, 29 D.P.R. 237 (1921); in a *novel* case such as this one, where there exists no specific precedent, *Ruiz Cabán v. Aguadilla Community Hospital Corporation*, Rev. 90-47; *De León v. Hospital Universitario de Puerto Rico*, 2008 T.S.P.R. 128; *Tanco v. Pepsi Cola de Puerto Rico*, (2000); *De León López v. Corporation Insular de Seguros*, 931 F. 3d 116 (1991); and which "shocks the conscience" of the common and decent citizen; causing us the following damages:

(1) For "reckless and callous indifference" by the System of Government of the Commonwealth of Puerto Rico through its government agencies and judicial forums of oversight in light of the abuse of power by Judge Ortiz and institutional mistreatment of the minor, pursuant to **Law 246**; "...a matter of the highest public policy that has always concerned the legislator," *Figueroa Hernández v. del Rosario Cervoni*, 98 T.S.P.R. 158; leaving victims of domestic violence unprotected and in a state of defenselessness, in violation of the "Violence

Against Women Act," 42 U.S.C. §13701; and contributing to the impunity and dictatorial immunity of Judge Lynette Ortiz-Martínez and the abuse of power of the Mayagüez Court; without launching a serious and impartial supporting investigation. This being, then, adequate cause of the damages to plaintiffs, *Leyva v. Aristud, supra*; 42 U.S.C.S. sec. 1983. 70 ALR Fed. 17; *Seibring v. Parcell's Inc.*, 178 Ill. App. 3d 62, 532 N.E. 2d 1335 (1988); *Canton v. Harris*, 489 U.S. 378; 103 L. Ed. 2d 412 (1989); *Mary M. v. Los Angeles*, 285 Cal. Rptr. 99, 814 P.2d 1341 (1991); the chain of causality that began with the negligent omission of the supervisor responsible for overseeing or guaranteeing compliance with the law. Each government agency or forum of oversight acted contrary to the cardinal constitutional principle of working "for" the people and violating the spirit of the law that inspired the **Doctrine of Separation of Powers**; in violation of our right of intimacy, liberty, property and other Civil Rights according to the appropriate degree of responsibility and negligence of its jurisdiction and ministerial duty. Causing us punitive damages valued at \$ \$60,000.00; causing suffering, despair, and mental anguish valued at \$ \$80,000.00; and successive and continuing damages, valued at \$ \$100,000.00. By virtue of the actions of "reckless and callous indifference" of Chief Justice of the Puerto Rico Supreme Court, the **Honorable Federico Hernández-Denton**; the **Honorable Sonia Ivette Vélez**, Director of the O.A.T.; the **Honorable Guillermo Somoza-Colombani**, Puerto Rico Secretary of Justice; **Attorney Tomas Rivera-Schatz**, former President of the Senate; **Attorney Wanda Vázquez**, Ombudswoman for Women; to whom we timely appealed and who did nothing, leaving us in the hands of the arbitrary and persecuting spirit of Judge Lynette Ortiz-Martínez.

(2) For moral damages, *Sagardía de Jesús v. Hospital Auxilio*

*Mutuo*, 2009 T.S.P.R. 173; for the "feeling of loss" that the Mayagüez Court has caused to my son, L.A.R.F., valued at \$ \$2,000,000.00; by virtue of the objective loss of suffering despair and the false belief of maternal abandonment, gradually forging in the minor a sense of loss similar to the loss caused by death; causing him mental anguish valued at \$ \$135,000.00. As a result of the unjust and illegal separation from the company, security, affection, protection, special and irreplaceable attention of his mother; without legal reason, *In re G.S.R.*, Cal. App. Second Div. B19700 (January 8, 2008); diminishing his potential qualify of life, *Bois v. U.S.*, 747 F. Supp. 109 (1990); *Kennedy v. U.S.*, 750 F. Supp. 206 (1990), *Rodríguez v. A.A.A.*, 98 D.P.R. 872 (1970). Causing him moral and pecuniary damages of irreversible consequences, as this assumed fact generates trauma rooted in "fear of the mother figure," damages valued at \$ \$83,000.00; with the prejudicial effect of continuing damages valued at \$ \$65,000.00; regardless of whether or not the minor is currently "aware of it," *Infante v. Leith*, 85 D.P.R. 26 (1962); *Koepf v. Sealand Services, Inc.*, 645 S.O. 2d. 1269 (1994); *Physical Impairment as a Separate Element of Damages*, 30 So. Texas L. Rev. 397 (1988); *McGee v. A & C and S, Inc.*, 933 S.O.2d 770 (2006). By virtue of a null sentence and the personal vendetta and bias of Judge Lynette Ortiz-Martínez for having reported her abuse of power to the O.A.T.

(3) For mental pain and suffering, *Fitzpatrick v. U.S.*, 74 F. Supp. 1023 (1991); *Capelouto v. Kaiser Foundation Hospital*, 500 P.2d 880 (1972); (and cases cited therein); caused to the minor, valued at \$ \$45,000.00; for

successive damages, valued at \$ \$70,000.00, by virtue of the changes ordered to his lifestyle and education in an "unreasonable, arbitrary and capricious" manner, *Rodríguez Rodríguez v. E.L.A.*, 130 D.P.R. 562 (1992); by the Mayagüez Court since December 14, 2011, such as: (a) an abrupt change of school and (b) a change of residence from the home of his mother to that of his father. When, presumably, what had been awarded was provisional custody to Mr. Aníbal Rodríguez, while I was incarcerated. It offends the senses!, that Judge Lynette Ortiz, as another method of oppression for having reported her to the O.A.T., ordered, by means of a resolution dated December 14, 2011, changes that from the outset had aspects that seemed to be permanent; additional evidence of her "ultra vires," biased, and "extra legem" actions. Hence, my parents were also ordered to turn over all of the clothing, medications, school materials, uniforms and notebooks of the minor. In such manner that minor L.A.R.F., being a victim of the vendetta of Judge Ortiz-Martínez against his mother, at the young age of eight (8), on the day of that very birthday, has had to suffer other foreseeable and shocking successive damages, such as: (1) a violent change of the maternal figure without legal reason; (2) changes to his daily routine of school, homework and special assignments; (3) changes in the discipline for doing tasks in the home, participating in simple activities for his personal enrichment and consistent discipline during a stage when the minor is most impressionable to having his character shaped or ruined for life; (4) change of a disciplinary structure based on *Sacred Scripture*, (5) change in the quality of medical services with private specialists and (6) interruption of specialized pharmacological treatment with a private psychiatrist; (7) attendance to the C.O.M.P.U. for renewal of the

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Individualized Program for the Minor [P.E.I., by its acronym in Spanish], and follow-up with those in charge of the Special Education Program of the Department of Education; (8) attendance to therapy and medical appointments, (9) regular attendance to the Seventh Day Adventist Church, and (10) for undermining my opportunity to raise him in a Christian and morally upright environment; even at the early age of seven (7), whether or not he is aware of it, *Infante v. Leith*, 85 D.P.R. 26 (1962); *Koeppe v. Sealand Services, Inc.*, 645 S.O. 2d 1269 (1994); *Physical Impairment as a Separate Element of Damages*, 30 So. Texas L. Rev. 397 (1988). *McGee v. A & C and S, Inc.*, 933 S.O. 2d 770 (2006).

(4) For not being able to spend time, or see, his mother freely and in a familiar environment, *Board of Regents v. Roth*, *supra*; by orders from Judge Ortiz-Martínez, by virtue of a null sentence; and by limiting maternal relations and visitation rights to closed circuit visits, without legal reason, since I was released from jail, in an "unreasonable, arbitrary and capricious" manner. Depriving the minor of his inalienable right to spontaneously enjoy the care, upbringing, and irreplaceable love of his mother, which substantially undermines his Constitutional Right to Life, *Soto Cabral v. E.L.A.*, 138 D.P.R. 298 (1995); to Liberty, and his Right of Intimacy; valued at \$ \$46,000.00; and punitive damages valued at \$ \$83,000.00; for the violation of his civil rights.

(5) For successive damages, *Hernández v. Matanza*, 34 D.P.R. 755 (1925); *The Powerlite of Puerto Rico v. CRUV*, 115 D.P.R. 654 (1984); *Velázquez Lozada v. Ponce Asphalt, Inc.*, 113 D.P.R. 39, 48 (1982); *Betances v. Autoridad de Transporte*, 73 D.P.R. 223, 225 (1952); caused to the minor L.A.R.F., valued at \$ 259,000.00; and mental anguish valued at

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\$ \$138,000.00 ; from having his innocent illusions frustrated, since December 14, 2011, when he was torn, without legal reason, from the arms of this mother, as my son was waiting to celebrate his birthday when he got out of school, with his mother, his grandparents, and friends from the neighborhood. For which reason, at 7:30 a.m., as he was leaving the home with his grandfather, on his way to school at the El Maní Elementary School in Mayagüez; the minor was saying to the neighbors: *Today is my birthday! Sing me happy birthday! My mother is going to celebrate my birthday when I get out of school.* To this day, the minor has never returned to our home.

(6) **For the objective loss of the capacity to enjoy life,<sup>19</sup> of my son L.A.R.F., which is independent of other moral damages, *Gutierrez Rodriguez v. Cartagena*, 882 F.2d 553, 580 (1989); *Harving v. Crowley Towing & Transport*, 24 F.3d 1480, 1485 (1994); as it is one of the most individual natural and constitutional rights, in its corollary right to the pursuit of happiness, *Board of Regents v. Roth, supra*; valued at \$ \$73,000.00 ; from the moment that the Mayagüez Court separated him without legal reason, *In re G.S.R.*, Cal. App. Second Div. B19700 (January 8, 2008); cruelly and unjustly, from his mother and grandparents who have helped me with his upbringing. Causing mental anguish to the minor, valued at \$ \$35,000.00 ; for suffering caused by not being in the care of his mother and grandparents, who have helped me raise him since birth; whether or not he is aware of it, *Infante v. Leith*, 85 D.P.R. 26 (1962); *Koep v. Sealand Services, Inc., supra*; *Physical Impairment as a Separate Element of Damages, supra*; *McGee v. A & C and S, Inc., supra*.**

<sup>19</sup> Capalli, Richard B., *Tort Damages in Puerto Rico*, 46 Rev. Jur. U.P.R. 241, 271 (1977).

(7) For continuing damages (*damnum emergens*) valued at \$ 120,000.000; caused to a minor with special limitations, by virtue of the institutional mistreatment pursuant to Law 246 of December 16, 2011, the "Law for the Safety, Well-being and Protection of Minors," of my son L.A.R.F. by the Mayagüez Court, at the Office of the Social Unit for Family and Minors, by "unreasonably, arbitrarily, and capriciously," *Rodríguez v. E.L.A.*, *supra*; confining us to restricted, supervised and recorded visitation, only one (1) day per week; under excessive and continuous observation, *Porrata v. The Wackenhut Corp.* 88 D.C.O. 003; with two bailiffs: one at the door and another in the waiting room. In this way, the Mayagüez Court trampled our rights as mother and son to the enjoyment of each other's company. In the alternative, that the minor sleep at our home on alternating nights; without legal grounds, *Lassiter v. Department of Social Service*, *supra*. Despite the fact that the minor would throw himself on the floor, shouting, crying and begging to be allowed to go home with his mother and grandparents, and that the bailiffs ended up ordering me to leave through the stairway of the Court below, because my son would grab onto my waist and wouldn't let go of me, or would stand at the elevator door to make sure I didn't leave without him. Ignoring, the Mayagüez Court, the mental anguish that it was causing the boy. (There are recordings of the voice of the minor during these supervised visitations, questioning why they would not allow him to return home). In this inhumane and insensitive manner, further dramatizing the state of impotence and defenselessness in which the Mayagüez Court had placed us both, through its despicable conspiracy, it caused **mental anguish to the minor**, valued at \$ 96,341.00; for the emotional instability, apprehension and feelings of

being cornered caused by keeping us under constant vigilance, *Porrata v. The Wackenhut Corp.*, *supra*; without legal grounds; in violation of our Right to Freedom, *Board of Regents v. Roth*, *supra*; and Right of Intimacy, *Lasso v. Iglesia Pentecostal La Nueva Jerusalem*, 129 D.P.R. 284 (1991), successive damages valued at \$ \$160,000.00; and punitive damages for violation of the civil rights of the minor valued at \$ \$145,000.00.

(8) The institutional mistreatment of the minor, pursuant to Law 246, *supra*; by the Mayagüez Court, in turn, has caused me, as a mother, suffering, despair, anxiety, bouts of depression, a pattern of tragic nightmares of death and persecution in different places, with mental anguish for the time irretrievably lost in the upbringing of the minor and fear that he will be returned to me with bruises, lesions, scars or serious illnesses. The unique and profound pain for the illegal loss of the custody of the minor, *Santosky v. Kramer*, *supra*; and the abusive, "unreasonable, arbitrary and capricious," *Rodríguez Rodriguez v. E.L.A.*, 130 D.P.R. 562 (1992); restriction of maternal visitation, without legal reason, *In re G.S.R.*, Cal. App. Second Div. B19700 (January 8, 2008); together represent an experience that most people cannot understand, generating many accusatory comments and discriminatory behaviors that have taken away my *enjoyment of life* *vida*; valued at \$ \$1,225,000.00. For the way in which my family and I have been criticized, accused, humiliated, and kept in an insensitive state of suspicion and mistrust, plots that have entailed further mental anguish; valued at \$ \$250,000.00; and successive and continuing damages valued at \$ \$160,000.00 for dishonor and harm to the reputation of our family.

(9) In addition to being illegally and unjustly deprived of the love,

affection, and company, *Rodríguez v. A.A.A.*, 98 D.P.R. 872 (1970); of the minor at a critical stage in his development, making me lose irreversible time as a mother for the formation of his character, education and upbringing. Given that the minor already had significant developmental delays stemming from his handicap of **severe Attention Deficit and Hyperactivity**; for which reason he was rejected by several private schools. The time that Judge Lynette Ortiz-Martínez has made me lose through her personal vendetta is irreversible, and we quote as pertinent:

*"... The whole future life of Moses, the great mission which he fulfilled as the leader of Israel, testifies to the importance of the work of the Christian mother. There is no other work that can equal this. To a very great extent the mother holds in her own hands the destiny of her children. She is dealing with developing minds and characters, working not alone for time, but for eternity. She has not to paint a form of beauty upon canvas or to chisel it from marble, but to impress upon a human soul the image of the divine (of God). Especially during their early years the responsibility rests upon her of forming the character of her children. The impressions now made upon their developing minds will remain with them all through life... Let every mother feel that her moments are priceless; her work will be tested in the solemn day of accounts. Then it will be found that many of the failures and crimes of men and women have resulted from the ignorance and neglect of those whose duty it was to guide their childish feet in the right way. Then it will be found that many who have blessed the world with the light of genius and truth and holiness, owe the principles that were the mainspring of their influence and success to a praying, Christian mother," Patriarchs and Prophets, Elena White, p. 244.*

Causing me continuing damages valued at \$ \$500,989.00; and punitive damages valued at \$ \$357,000.00.

(10) For physically releasing me but keeping me emotionally incarcerated without returning my son immediately, without legal reason, as an "ad finitum" punishment, a cruel and unusual punishment forbidden by the Eighth Amendment, *Harmelin v. Michigan*, 111 S. Ct. 2680 (1991); *Solem v. Helm*, 103 S. Ct. 3001 (1983); *Amy Angulo v. Deporte Hipico*, *supra*; for personal

discrimination and discrimination for social condition, for being a lawyer that Judge Lynette Ortiz-Martínez had to humiliate and drown her spirit of denunciation, struggle and indignation in the face of her **habitual abuse of power**. Instead of correcting, honestly and with calm judicial temperament, the multiple errors and defects warranting annulment of her sentence of September 7, 2011; she instead chose to victimize a lawyer who is above all a decent working class mother, with spite and malice. A mother who, after being unjustly and illegally deprived of her freedom, has continued to be cornered and persecuted at the Mayagüez Court, by virtue of a null sentence, *González v. Mayagüez Resort & Casino*, *supra*; *Carattini v. Collazo Syst. Analysis, Inc.*, *supra*; *Vázquez v. A.R.P.E.*, *supra*; *Davis v. Davis*, *supra*; *Tartak v. Trib. de Distrito*, *supra*; *Pennoyer v. Neff*, *supra*; at risk of being incarcerated once again, through malicious persecution, causing me damages valued at \$ \$173,000.00, *García Colón v. Vélez*, RE-87-224; *Donneal Boschette V. Bach*, Civil 93-1528 (JP), (February 2, 1996); *Marso v. De Bertalo*, Civil 93-1797 (JP), (January 18, 1996); *Bonilla v. Trebol Motors*, Civil 92-1795 (JP), (December 19, 1995); *Saville v. Roberts* (1698), 91 English Repartos 1147; *González y Otro v. Quiles y Otro*, KLAN9-7-00911; *Pereira v. Hernández*, *supra*; *Paris v. Ruiz*; mental anguish valued at \$ \$197,890.00 and punitive damages valued at \$ \$389,934.00.

(11) For mental anguish caused to my son, *Capelouto v. Kaiser Foundation Hospital*, 500 P. 2d 880 (1972), (and cases cited therein); valued at \$ \$274,000.00; by Mr. Aníbal Rodríguez-García and Mrs. Gisella L/N/U, both professional educators in Special Education, for *the objective loss of the company* and affection of his mother, *Rodríguez v. A.A.A.*, 98 D.P.R. 872 (1970);

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valued at \$ \$140,000.00; by not allowing this minor with special handicaps to communicate with me by telephone freely and spontaneous, during this entire year. Despite the fact that the child already knows how to handle a cell phone on his own, as he is already eight (8) years old. Both of these professionals in Special Education have subjected the minor to violently dramatic emotional abuse because of his condition of severe Attention Deficit and Hyperactivity, for which reason he is more vulnerable and impressionable than other children his age. Creating the conditions for the minor to believe that he had been abandoned by his mother. Causing the minor continuing damages valued at \$ \$289,000.00. Additionally causing his loss of happiness, *Cintrón Adorno v. Gómez*, 147 D.P.R. 576, 589 (1999); *McDougald v. Garber*, 536 N.E. 2d 372 (N.Y. 1989); valued at \$ \$293,000.00; whether or not he is aware of it, *Infante v. Leith*, 85 D.P.R. 26 (1962); *Koeppe v. Sealand Services, Inc.*, *supra*; *Physical Impairment as a Separate Element of Damages*, *supra*; *McGee v. A & C and S, Inc.*, *supra*; and independently of other moral damages, *Gutiérrez Rodríguez v. Cartagena*, 882 F.2d. 553, 580 (1989); *Harving v. Crowley Towing & Transport*, 24 F.3d. 1480, 1485 (1994); caused to the minor; and punitive damages for the violation of the civil rights of the minor, valued at \$ \$385,000.00. Amounts to be paid jointly and severally.

(12) For Mr. Aníbal Rodríguez-García and Mrs. Gisella L/N/U, both professionals in human behavior, not having allowed the minor to freely communicate, by telephone, with his octogenarian maternal grandparents, Mr. Juan B. Feliciano-Rivera and Mrs. Paula Antonia Rosado-Rodríguez, who have cared for him since birth, and whose life expectancy is decreased because of their

age; at this stage in their lives. Cutting off their conversation, violently and cruelly, on two (2) occasions, as soon as minor L.A.R.F., innocently revealed their terrorist identities, calling them by their names: "Gishe 'I'la". Both behavioral professionals subjected my parents to profound mental anguish valued at \$ \$173,050.00.

My mother cried as a result of every failed attempt at communication with her grandson. Amounts to be paid jointly and severally.

(13) Mr. Aníbal Rodríguez-García has tensely maintained unilateral control of parental relations. In a sadistic and coldly calculated manner he has enjoyed the damage and humiliation he has caused me through his **malicious persecution** with false and unacceptable accusations, offered since the year 2007 to social agencies, the police, the F.D.E.M.H. Law School, the Mayagüez Court, the minor's teachers, specialists and therapists, the members of the Adventist congregation, etc. In this manner, Mr. Aníbal Rodríguez-García has kept me in a practically endless and inescapable cycle of domestic violence, through malicious persecution, causing me profound mental anguish valued at \$ 120,000.00 and moral damage to my reputation valued at \$ 259,000.00.

(14) For Mr. Aníbal Rodríguez-García, through diverse and unexpected actions, having used the minor as merchandise to free himself from the payment of child support, **exploiting him emotionally and psychologically**, by manipulating his affection and loyalties and turning him against his own mother, an irreplaceable figure in the life of the child, causing mental anguish due to instability and emotional uncertainty, valued at \$ \$92,959.00. For using the court to harass and victimize me with the purpose of making me an unfit mother for custody of the minor and leave me with the responsibility of paying child support. Which is

contrary to the admonishment of the Puerto Rico Supreme Court regarding the value of the life of a child, to wit: "*Within the hierarchy of moral values, human life is considered a more important right and the loss of human life is the loss of a legal right of higher importance. For said reasons, human life cannot be considered a financial burden.*" ***Soto Cabral v. E.L.A., et al.***, 138 D.P.R. 298 (1995). Dispossessing us of our right to property and liberty, without due process of law, valued at \$ 390,000.00; through fraud, "*mens rea*" and ruse, to free himself from the payment of child support, which he could not have achieved otherwise. Causing us damages by undermining our intimacy, liberty and property, valued at \$ \$138,000.34.

(15) For the Mayagüez Court causing the **undermining the future earning potential of minor L.A.R.F.**, ***Branda v. Wal-mart, Inc.***, 803 So.2d 1039 (2001); valued at \$ \$1,159,000.00; who belongs to the **Special Education Program of the Department of Education**, and is protected by special legislation for this population, by placing him at a disadvantage of suffering irreversible and irreparable emotional and psychological trauma by violating his inalienable right, ***García v. E.L.A.***, *supra*; to be with his mother during a critical stage of his development. Creating yet another handicap for minor L.A.R.F., ***Font v. Viking Construction, Corp.***, 58 D.P.R. 689 (1941); ***Muñoz v. The New York and Porto Rico Steamship, Co.***, 72 D.P.R. 582 (1951); ***Morales Muñoz v. Castro***, 85 D.P.R. 288 (1962); ***Concepción Guzmán v. A.F.F.***, 92 D.P.R. 488 (1965); with moral damages for pain and suffering valued at \$ \$200,550.00. Also, for the Mayagüez Court limiting, with bias, the guarantees provided to my son by said special legislation in the sense of changing schools because of his special

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limitation, "No Child Left Behind," and reasonable accommodation to optimize the conditions favorable to his development, which has the effect of discrimination due to social condition, triggering Civil Rights Section 1983, *Bonilla v. Chardón*, *supra*; *Rivera v. E.L.A.*, 121 D.P.R. 582 (1988), damages valued at \$ \$289,000.00. Causing him punitive damages for violation of his civil rights, valued at \$ \$250,000.00.

(16) For continuing damages, *Wycko v. Gnodtke*, 105 N.W. 2d 118 (1960); caused to me, as a mother, by illegally depriving me of the custody of my son, for one year, valued at \$ \$3,799.000.00, who Judge Lynette Ortiz-Martínez has taken hostage for having reported her to the O.A.T. for abuse of power, an atypical, unprecedented case, *Ruiz Cabán v. Aguadilla Community Hospital Corporation*, *supra*; *De León v. Hospital Universitario de Puerto Rico*, *supra*; *Tanco v. Pepsi Cola de Puerto Rico*, *supra*; *De León López v. Corporation Insular de Seguros*, *supra*; since December 14, 2011 and until the present; for not having been able to see him since February 6, 2012, by virtue of an order of protection issued against me on February 13, 2012 for having recorded a video of my son, on the grounds of the Mayagüez Court; as part of the malicious persecution of the court below and its attack on my freedom of expression. My defenseless son is being kept from his mother as "spoils of war," when the Puerto Rico Supreme Court has stated that "human life is a legal right, an economic value like any other, deserving protection more than any other, a social capital destined to be a future source of benefits, especially in homes with modest resources, and parents, in losing their children, suffer the loss of the expenses and sacrifices, financially translatable, that they have incurred to sustain life, as well as the

justified hope of protection or support in their old age," *Traviso v. Del Toro y Travieso*, 74 D.P.R. 1009 (1953). Hence, we petition for repair for real continuing damage, valued at \$390,000.00, caused to me and our family, by depriving me of the custody of my son, without legal reason, *In re G.S.R.*, Cal. App. Second Div. B19700 (January 8, 2008); consisting of the financial investment of time and money that I, as a mother, and my parents, have made in his upbringing, education and health since gestation and until the day he was unjustly taken from me.

(17) For ordering my unjust and illegal incarceration, by virtue of a null sentence, *González v. Mayagüez Resort & Casino*, 176 D.P.R. \_\_, (2009); *Carattini v. Collazo Syst. Analysis, Inc.*, 158 D.P.R. 345, 355 (2003); *Vázquez v. A.R.P.E.*, 128 D.P.R. 513, 537 (1991); *Davis v. Davis*, 9 Ill. App. 3d 922, 929, 293 N.E. 2d 399, 405 (1973); *Tartak v. Trib. de Distrito*, 74 D.P.R. 862, 870 (1953); *Pennoyer v. Neff*, 95 U.S. 714 (1878); depriving me of my right to liberty and property without due process of law, *Board of Regents v. Roth*, *supra*. An irreversible and irreparable moral and pecuniary damage, that entails the deprivation of other rights and continuing and successive damages, valued at \$ 2,390,000.00. Also, for causing me profound mental anguish valued at \$ 92,000.00; due to illegal and unjust confinement. The leg shackles created lesions on my ankles because they did not have socks for me at the jail. And, as part of the regulations of the Vega Alta Jail for Women, inmates are not allowed to make telephone calls until after they have been confined for one (1) month, and not before. Hence, when I was released into the community, I felt abandoned, forsaken, and alone. I didn't know who to call because I did not have

my cell phone directory with me, or identification, or money. I did not have the right to make telephone calls, and there was no public phone available outside of the jail. So I experienced the despair, hopelessness and uncertainty of being released from jail without knowing what I was going to do because I had nobody waiting for me outside. At the time, I had just gotten out of jail and nobody would help me because the community surrounding the jail is suspicious of that population. Also, at the hearing on my release, on December 21, 2011; I only saw my father through the glass because he was in the waiting room, crying disconsolately because of the impact of seeing me, for the first time, in leg shackles, handcuffs, and dressed in a prison uniform. I was not allowed to speak to him. The Mayagüez Court has made me and my entire family go through this dehumanizing suffering, without legal grounds, based on a fabricated case of contempt and by virtue of a null sentence, *González v. Mayagüez Resort & Casino, supra; Carattini v. Collazo Syst. Analysis, Inc., supra; Vázquez v. A.R.P.E., supra; Davis v. Davis, supra; Tartak v. Trib. de Distrito, supra; Pennoyer v. Neff, supra*. Causing me punitive damages for the intentional and malicious violation of my civil rights, valued at \$ \$199,000.00.

(18) For the profound mental anguish caused to my parents, valued at \$ \$288,000.00 by the anxiety and uncertainty they felt for fear that something would happen to me while I was incarcerated, because of the myths surrounding the prison environment, the shame and lack of understanding by the public, and because we had no communication, since the 14<sup>th</sup>, when I was incarcerated, until December 23, 2011; when I arrived at my parents house in Mayagüez in a taxicab, that charged them \$175.00 (one hundred and seventy-five

dollars); because I was afraid that if I travelled on the less expensive Línea Sultana, the other former inmates who travelled with me on the same route, would know where my parents lived and place them at risk.

(19) For ordering my incarceration once again, in an "unreasonable, arbitrary and capricious" manner, *Rodríguez Rodríguez*, v. E.L.A., 130 D.P.R. 562 (1992); for two (2) additional days, after having issued a Writ of Release from Prison, since December 21, 2011, increasing my suffering and mental anguish, valued at \$ \$350,000.00; for the fear of being in such a dangerous place and with a peculiarly heterogeneous population. Causing me punitive damages resulting from the intentional and malicious violation of my civil rights, valued at \$ \$370,000.00.

(20) For Judge Lynette Ortiz-Martínez threatening, pursuant to Article 188 of the 2004 Penal Code, *supra*; arbitrarily playing with my freedom, to "convert every \$25.00 that you don't pay into one day in jail," at the highest-risk Penal Institution for Women in Puerto Rico, if I didn't pay a \$500.00 fine to the Clara Lair Program of the Mayagüez Court, increasing my suffering and mental anguish, valued at \$ 82,000.00, for fear of being incarcerated once again if I could not get the money, since my parents and brother had already paid the attorney's fees for my release from prison, the feeling of apprehension and paranoia of being persecuted and arrested; without legal grounds, at any moment. As another method of oppression and by virtue of a null and unending sentence, and as cruel and unusual punishment; in the face of the manifest abuse of power of Judge Lynette Ortiz-Martínez; playing with my freedom, without due process of law. Putting at risk my liberty, by virtue of her bias and discrimination against me

due to social condition, in violation of due process of law and equal protection under the law, **Fourteenth Amendment**; and based on a null judicial proceeding, **Ríos v. Municipio de Isabela**, 2003 T.S.P.R. 122. Causing me punitive damages valued at \$ \$279,000.00

(21) For moral damages due to suffering and physical and mental anguish, **Sagardía de Jesús v. Hospital Auxilio Mutuo**, 2009 T.S.P.R. 173; **Powers v. U.S.**, 589 F. Supp. 1084; 1106 (1984); valued at \$ \$770,000.00 by virtue of the emotional post-trauma suffered by a decent, morally correct, and Christian person such as myself, after living through the dehumanizing and emotionally overwhelming experience of going to jail, being unjustly deprived of my liberty, **Board of Regents v. Roth**, *supra*. A moral damage, with continuing and successive damages, **Santiago v. Ríos Alonso**, 156 D.P.R. 181 (2002); valued at \$ \$179,000.00; which I continue to suffer today as I reintegrate myself into the free community, where I used to be admired, but have now been made a victim of attacks on my freedom and intimacy, **Board of Regents v. Roth**, *supra*. Producing physical injuries, such as: difficulty falling asleep, a pattern of nightmares, back pain, and which has aggravated my hair loss, together with the psychological injuries than translate into: fear, uneasiness, hopelessness, anxiety, paranoia of being followed, feelings of humiliation and shame, apprehension, depression, confusion, social isolation. For moral damage to my reputation valued at \$ \$189,998.00 and the undermining of my intrapersonal and intrafamiliar sensitivity, problems with personal strength and professional growth, by virtue of the judgment, disbelief, illegitimate guilt, attitudes of rejection, hostile and condemnatory words, accusing silence, discriminatory behaviors and loss of the

trust of the religious group where I grew up; which effects may last indefinitely, *Elba A.B.M. v. U.P.R. et al.*, 125 D.P.R. 294 (1990); *Colombani v. Gob. Municipal, supra*. Injuring the dignity, integrity and honor I enjoyed before going to jail, with relatives, neighbors, at work and at church. Nevertheless, this **external objective loss of high opinion and esteem**, *Sociedad de Gananciales v. El Vocero*, 135 D.P.R. 122 (1994); has caused suffering and mental anguish, to me and my parents, valued at \$ 235,000.00. For damages that go beyond passing sadness, as they substantially affect the quality of my life, health, well-being and pursuit of happiness, *Board of Regents v. Roth, supra*; *Moa v. E.L.A.*, 100 D.P.R. 573 (1972); and enjoyment of life.

(22) For damages caused by the **malicious persecution** of Judge Lynette Ortiz-Martínez, valued at \$ 169,000.00; by virtue of "unreasonable, arbitrary and capricious" orders, *Rodríguez Rodríguez, v. E.L.A., supra*; a null sentence issued in absence of jurisdiction since September 7, 2011; through a scheme worthy of organized crime, **Racketeering Act of the Commonwealth of Puerto Rico**, 25 L.P.R.A. § 971 et seq.; and the **Racketeer Influenced and Corruption Organizations Act**, 18 U.S.C. § 1961 et seq.

(23) For depriving us of our **Right to Liberty and Property**, *Board of Regents v. Roth, supra*; to petition the appellate forums for review of the judgment of September 7, 2011, valued at \$ 2,292,550.00. Through a sophisticated scheme that includes: **falsifying documents**, prohibited by **Article 218** of the 2004 Penal Code, *supra*; **ideological falsehood**, prohibited by **Article 219** of the 2004 Penal Code, *supra*; **destruction of evidence**, prohibited by **Article 291** of the 2004 Penal Code, *supra*; and **backdating** legal documents, prohibited by

Article 292 of the 2004 Penal Code, *supra*; illegal use of public works or services, prohibited by Article 255 of the 2004 Penal Code, *supra*; undue intervention in government operations, prohibited by Article 257 of the 2004 Penal Code, *supra*; undue influences, prohibited by Article 264 of the 2004 Penal Code, *supra*; fraud, prohibited by Article 210 of the 2004 Penal Code, *supra*; undue influence in adjudication, prohibited by Article 297 of the 2004 Penal Code, *supra*; entrapment, prohibited by Article 31 of the 2004 Penal Code, *supra*; intrinsic fraud by the court, *Pardo Stella v. Stella Royo*, 145 D.P.R. 816, (1998). For damages, pain and suffering and mental anguish due to the torture and humiliation, pain and despair caused by the abuse of discretion and power of Judge Ortiz-Martínez, for keeping me in a constant state of vigilance, *Porrata v. The Wackenhut Corp.*, 88 D.C.O. 003; valued at \$ \$250,000.00; as another method of oppression, to the point of personally calling the Vega Alta Women's Jail to ensure that they subject me to psychological and psychiatric evaluations, on December 19, 2011. She called again on December 20, 2011, to speak directly to Psychologist Bonnie \_\_\_\_\_ at the jail, who later informed that Judge Ortiz has asked her the following: How did you find Doña Maira? How does she look, physically? Judge Ortiz continued her malicious persecution and constant vigilance, *Porrata v. The Wackenhut Corp.*, *supra*; in violation of my right of intimacy, valued at \$ \$47,000.00; because being in jail does not mean I lose my civil rights. Hence, she intentionally caused me punitive damages valued at \$ \$93,000.00; during my jail confinement by violating my civil rights. Also causing me successive damages valued at \$ \$180,000.00; after ordering my release on December 21, 2011; by setting in motion, in an

unreasonable, arbitrary and capricious manner, *Rodríguez v. E.L.A.*, *supra*; another forensic social investigation by the court, without legal reason; and ordering further behavioral examinations: psychological and psychiatric, *Verneuil v. Poitier*, 589 So. 2d 1202 (1991); attacking my Right of Intimacy, *Lasso v. Iglesia Pentecostal la Nueva Jerusalén*, 123 D.P.R. 284 (1991). In addition to the continuous and excessive summons by Judge Ortiz and her husband, Professor Nasser Taha, without legal grounds and in retaliation for having reported her to the Puerto Rico Office of Courts Administration and through text messages to trusted persons, in violation of my Right to Liberty, *Board of Regents v. Roth*, *supra*; that includes the Right of Intimacy and to Freedom of Expression, valued at \$ \$82,000.00. In addition, because the facts of this case establish a *prima facie* case of abuse of power that triggers section 1983 of the Civil Rights Act, *supra*; punitive damages valued at \$ \$87,000.00. Acting in *bad faith*, in solidarity, and becoming a part of the cycle of domestic violence that my family had been living at the hands of Mr. Aníbal Rodríguez-García sin the year 2003 and until the present; the Ortiz-Taha attorneys have persecuted us, causing continuing damages, *Santiago v. Ríos Alonso*, *supra*; valued at \$ \$98,000.00; with every dramatic summons, and causing us damage, humiliation, the undermining of our reputation and honor with the Examining Board, the Puerto Rico Supreme Court itself, the community, my workplace, and the Seventh Day Adventist Church; with the purpose of keeping me in a state of apprehension and fear.

(24) For malicious persecution by Prof. Nasser Taha, valued at \$ \$100,000.00; causing me mental anguish valued at

\$ \$132,000.00 ; for his obstinacy in persecuting me with prior censorship, **Aponte v. Lugo**, 100 D.P.R. 282 (1971); **Asoc. de Medicina Podiátrica v. Dr. Romero Bassó**, 2002 T.S.P.R. 80; and for having acted *under color of authority*, **Leyva v. Aristud**, *supra*; because he is the husband of Judge Lynette Ortiz-Martínez, in violation of my Right to Freedom of Expression, **Ranking v. Mcpherson**, 107 S. Ct. 2891; **New York Times v. Sullivan**, *supra*; **Landmark Comm. v. Va.**, *supra*; and for punitive damages valued at \$ \$68,000.00 ; for the violation of my Civil Rights. Acting in violation of my Right of Intimacy, in its corollary "against unreasonable searches and seizures," Fourth Amendment, **US v. Mendenhall**, 446 US 544 (1980); **Katz v. United States**, 389 US 347, 350 (1967); causing me damages valued at \$ \$150,000.00 .

(25) Lawsuit is brought against **District Attorney Esteban Miranda**, Head of the Office of the District Attorney of the Mayagüez Judicial Center, in his official capacity, for participating in the Conspiracy, pursuant to Article 249 of the Civil Code, *supra*; **In re Clavell**, 131 D.P.R. 500 (1992); between Judge Lynette Ortiz-Martínez, her husband Attorney Nasser Taha; Attorney Olga Longoria-Vélez, Mr. Aníbal Rodríguez-García, and other court officials; to file criminal charges against me as another mechanism. He summoned me on several occasions to the office of the District Attorney, keeping me in a state of apprehension and coercion, causing me damages por malicious persecution valued at \$ \$53,190.00 . Also, undermining my Right to Property, **Board of Regents v. Roth**, *supra*; without due process of law, by forcing me, through several unfounded and malicious summons, to risk my work schedule. With the purpose of keeping me tense and with a feeling of apprehension within an atmosphere of being under

custody, *Illinois v. Perkins*, 494 U.S. 357 (1990); at his office at the Office of the District Attorney, causing me damages for mental anguish valued at \$ 120,000.00. In addition, District Attorney Esteban Miranda threatened to deprive me of my right to exercise the legal profession, without having heard my testimony first, *Pueblo v. López*, 118 D.P.R. 515; *Pueblo v. Sulman*, 103 D.P.R. 429; *Edwards v. Arizona*, 101 S. Ct. 1880; and in the presence of my attorney, *Edwards v. Arizona*, 101 S. Ct. 1880; *Pueblo v. Falú*, 116 D.P.R. 828; *Moran v. Burbine*, 106 S. Ct. 1135 (1986); *Pueblo v. López Guzmán*, 131 D.P.R. 867 (1992); depriving me of my Constitutional Right to the presumption of innocence, pursuant to Article II, Section 11, of the Bill of Rights of the Commonwealth of Puerto Rico; and Rule 110 of Criminal Procedure, *Pueblo v. Ramos*, 122 D.P.R. 287 (1988); *Pueblo v. Rodriguez*, 146 D.P.R. 860 (1998); *Pueblo v. Irizarry*, 2002 T.S.P.R. 62. District Attorney Miranda oppressed me for my silence as a punishment for having exercised my Right Against Self-incrimination, protected by the Fifth Amendment, and *Miranda v. Arizona*, 384 U.S. 436 (1966); *Pueblo v. J.A.B.C.*, 123 D.P.R. 551 (1989), causing me punitive damages for the violation of my civil rights and liberties valued at \$ 32,000.00. Due to his evident bias, District Attorney Miranda "lacked the authority to file the complaint," *Pueblo v. Torres*, 132 D.P.R. 77 (1992). However, without sacrificing his personal interest in the case, *Facultad para las Ciencias Sociales v. C.E.S.*, 133 D.P.R. 521 (1993); as a friend of the Taha-Ortiz marriage. In this state of affairs, District Attorney Miranda also interfered with my Right to Property, *Board of Regents Roth*, *supra*; in its aspect of the right to practice a profession, *Torres v. Junta Examinadora de Ingenieros*, 2004

T.S.P.R. 65; valued at \$ \$150,000.00; by virtue of his undue influences, *In re Carlos Franco Soto*, 115 D.P.R. 740, (1984); in the Mayáquez Court, threatening to deprive me of my right to work, a right to life that is protected by Due Process of Law, Fourteenth Amendment. Faced with the actions of crass abuse of power by Judge Lynette Ortiz-Martínez, together with her husband, Attorney Taha, that "shock the conscience" and an abuse of discretion that "offends the senses," by which my son and I were being victimized in the Court below, District Attorney Miranda was negligent and demonstrated grave indifference by not putting an end to the abuse and injustice. Revealing *prima facie* a reckless or callous indifference to his principal obligation to be the attorney for the people of Puerto Rico, sufficiently substantial as to trigger Section 1983, **42 U.S.C. Section 1983; Civil Rights Cases**, 109 U.S. 3 (1883); *Rendell-Baker v. Kohn*, 457 U.S. 830 (1982); *Acevedo v. Srio. Servicios Sociales*, *supra*; causing me punitive damages valued at \$ \$180,000.00.

(26) For damages caused through malicious persecution by Attorney Olga Longoria-Vélez, valued at \$ \$750,000.00; who in order to prevail at any cost has forced causes, lied in her motions, *In re Rodríguez Torres*, 104 D.P.R. 758 (1976); *In re Pagán Colón*, 100 D.P.R. 223 (1971); and through illegitimate forensic strategies at the level of organized crime, including the manipulation of police reports with ideological falsehood and false statements, forced my unjust and illegal incarceration. In such a way that, with "mens rea" and acting in conspiracy, pursuant to Article 249 of the 2004 Penal Code, *supra*; with Mr. Aníbal Rodríguez-García, they extended and made inescapable the cycle of domestic violence in which my son and I had been living since the year 2003 and

until the present. Hence, Attorney Olga Longoria-Vélez has persecuted me, causing **successive and continuing damages** valued at **\$ 160,000.00**, **Santiago v. Ríos Alonso, supra**; for having contaminated the environment in my workplace, intentionally and maliciously, through dramatic and continuous summons; for creating in me a fear of apprehension and the need to move several times because of the dramatic and continuous service of summons at my place of residence; for having to take a leave due to emotional illness through the C.F.S.E., causing me mental anguish valued at **\$ 550,000.00**. For causing me continuing damages valued at **\$ 357,000.00** for depriving me of my right to property valued at **\$ 148,000.00**; founded on an entirely null legal proceeding, to which Attorney Longoria contributed with her illegality, and fraudulently garnishing my paycheck in favor of Mr. Aníbal Rodríguez-García by virtue of her undue influence in the adjudication of the sentence. In addition, I was ordered to pay a credit for \$900.00 retroactively, as if I had been in arrears or owed any late amount in child support; by virtue of an "ultra vires" order and a sentence that is null based on absence of jurisdiction and errors of fact and law. These continuing damages also include humiliation, substantial undermining of our reputation and honor in the general community and with the Puerto Rico Supreme Court itself, which damages my credibility at the Seventh Day Adventist Church and my workplace; causing me moral damages to my honor, reputation, private and family life, valued at **\$ 180,000.00**. All of this with the purpose of taking my son from me and exempting Mr. Aníbal Rodríguez from the payment of child support; leaving me with the responsibility for paying such support since December 21, 2011. Hence, we petition for compensation from Attorney Longoria

for suffering and mental anguish caused to the minor, *Sagardia de Jesús v. Hospital Auxilio Mutuo*, 2009 T.S.P.R. 173; *Powers v. U.S.*, 589 F. Supp. 1084; 1106 (1984); valued at \$ \$285,000.00; and punitive damages caused to the minor for the violation of his civil rights, *BMW of North America, Inc. v. Gore*; 64 LW 4335 (1996); *Alaimo v. Royer*, 448 F. 2d 207 (1982); *Crowly v. Global Realty Inc.*, 474 A. 2d 1056 (1984); valued at \$ \$1,345,000.00. For her illegitimate forensic strategies, at the level of organized crime, y for her undue influence in adjudication at the Mayagüez Court; making my son and me victims of oppression and damage, *Ruiz v. San Juan Racing*, 102 D.P.R. 45; and my family as well. Through: every motion filed unduly and maliciously by **falsifying documents**, Article 218 of the 2004 Penal Code, *supra*; **ideological falsehood**, pursuant to Article 219 of the 2004 Penal Code, *supra*; **illegal use of public works or services**, pursuant to Article 255 of the 2004 Penal Code, *supra*; **undue intervention in government operations**, pursuant to Article 257 of the 2004 Penal Code, *supra*; **undue influence**, pursuant to Article 264 of the 2004 Penal Code, *supra*; **fraud**, pursuant to Article 210 of the 2004 Penal Code, *supra*; **undue influence in adjudication**, pursuant to Article 297 of the 2004 Penal Code, *supra*; and **entrapment**, pursuant to Article 31 of the 2004 Penal Code, *supra*. For contaminating my workplace environment capriciously and arbitrarily, with continuous and dramatic summons without considering the impression it created on third (3<sup>rd</sup>) parties, in violation of my right to property in the expectation of employment safety and security, to the enjoyment of my job and my right to have a private life away from the scrutiny and prejudices of my coworkers, parents and students; causing me damages valued at \$ \$1,350,000.00; for mental

anguish valued at \$ \$290,000.00 and for punitive damages valued at \$ \$2,500,000.00 for violating my civil rights.

(27) For moral damages due to mental anguish valued at \$ \$92,000.00, caused to my relatives, my parents, Mr. Juan B. Feliciano-Rivera, Mrs. Antonia Rosado-Rodríguez and my brother, Mr. Melvil Juan Feliciano-Rosado; by virtue of moral damage for loss of the company and affection, *Bois v. U.S.*, 747 F. Supp. 109 (1990); of minor L.A.R.F., moral damages valued at \$ \$175,000.00. In addition to continuing damage, *Hernández v. Matanzo*, 34 D.P.R. 755 (1925); *The Powerlite of Puerto Rico v. CRUV*, 115 D.P.R. 654 (1984); *Velázquez Lozada v. Ponce Asphalt, Inc.*, 113 D.P.R. 39, 48 (1982); *Betances v. Autoridad de Transporte*, 73 D.P.R. 223, 225 (1952); valued at \$ \$83,000.00 stemming from the frustrated investment in Christmas gifts that were never delivered to the minor, trips to Miami made by my brother, the uncle of the minor, to spend time with him, and expenses related to my release from prison, as well as the expenses related to instant complaint, which were part of the savings of my family; by virtue of my unjust incarceration and the illegal loss of the custody of the minor, *In re G.S.R.*, Cal. App. Second Div. B19700 (January 8, 2008); *Santosky v. Kramer*, 455 U.S. 745 (1982).

(28) For Judge Ortiz-Martínez, putting into practice, deliberately and intentionally, a scheme of continuous and reiterated violations to human dignity, *López Campos v. Garaje Isla Verde, Inc.*, 126 D.P.R. 166 (1990); of "bullying"; under color of authority, *Leyva v. Aristud*, *supra*; causing me mental anguish valued at \$ \$400,000.00; for the humiliation, shame, discredit and undermining of honor, reputation and personal dignity and family intimacy, causing

me moral damages valued at \$ \$165,000.00 | For her "personal prejudice and bias," **Pastrana v. Chater, supra**; triggering the protection of due process of law, for her discrimination based on social condition, causing us punitive damages for her intentional and malicious violation of our civil rights, valued at \$ \$495,000.00 | .

(29) For Attorney **Stephanie Cabrera** and S.W. **Diany Pérez**, in solidarity with Judge Lynette Ortiz-Martínez, subjecting me to a scheme of "bullying" that included enslaving, oppressive and servile conditions, and a pattern of humiliation at the Clara Lair Program for abused women of the Mayagüez Court. Manifesting "reckless or callous indifference," **Leyva v. Aristud, supra**; because of the abuse of power by Magistrate Ortiz. Manifesting intransigence, arrogance and negligence regarding my legitimate and oppressive situation, they inserted themselfed into the cycle of domestic violence and illegally interfered with the execution of my sentence to 90 hours of Community Service; a matter over which the Puerto Rico Department of Corrections has total jurisdiction; failing to comply, with haughtiness and prejudice against me, with **Article 54 of the 2004 Penal Code**; which for constitutional purposes is discrimination due to social condition that trigger the **Clause on Equal Protection Under the Law**, pursuant to Article II, Section 8, of the Constitution of the Commonwealth of Puerto Rico; and assumes "the form of monetary compensation equivalent to the damage caused," **López Campos v. Garaje Isla Verde, Inc.**, 126 D.P.R. 166 (1990); causing moral damages to my personal dignity, valued at \$ \$195,000.00 | . Causing me punitive damages, valued at \$ \$200,500.00 | ; **BMW of North America, Inc. v. Gore**; 64 LW 4335 (1996); **Alaimo v. Royer**, 448 F.2d 207 (1982); **Crowly v.**

**Global Realty Inc.**, 474 A. 2d 1056 (1984); for their malicious violation of my civil rights; and damages for mental anguish valued at \$ \$195,250.00. For continuing damages, valued at \$ \$75,000.00, for having testified with ideological falsehood, perjury and fabrication of evidence against me, which resulted in my illegal and unjust incarceration and the summary and abusive loss of the custody of the minor, to this day.

(30) For the violation by Judge Ortiz-Martínez of my **Right to Property** in its corollary expectation of permanent employment as a career employee, valued at \$ \$270,000.00; putting me at risk of losing my position as a School Counselor at the Dr. Pedro Perea Fajardo Vocational High School in Mayagüez, because Judge Ortiz intended that I sacrifice my working hours to comply, in an "*unreasonable, arbitrary and capricious*" manner, **Rodríguez Rodriguez v. E.L.A.**, 130 D.P.R. 562 (1992); with her sentence to 90 hours of community service; causing me mental anguish valued at \$ \$285,000.00.

(31) For the violation by Judge Ortiz-Martínez, of our **Right to Liberty** and **Property**, **Board of Regents v. Roth**, *supra*; damages valued at \$ \$1,800.000.00; in its corollary property recognized by virtue of "a state of law" under the Constitution and our statutory rights, through the imposition of Joint Custody, biased in favor of the opposing party, and erroneously rejecting evidence, **Kotteacos v. United States**, 328 U.S. 750 (1946); in an "*unreasonable, arbitrary and capricious*" manner, **Rodríguez v. E.L.A.**, *supra*; on the handicaps and special needs of my son. In turn, for discrimination based on handicap, **Bonilla v. Chardón**, *supra*; **Vera González v. C.F.S.E.**, 2004 WL 3254847; **Guardiola Álvarez v. Dpto. de la Vivienda**, 2007 WL 871456; **García v. E.L.A.**,

supra; in violation of equal protection under the law, damages valued at \$ \$890,000.00; and mental anguish caused to the minor, valued at \$ \$679,000.00; *Fitzpatrick v. U.S.*, 74 F. Supp. 1023 (1991); *Capelouto v. Kaiser Foundation Hospital*, for the uncertainty and insecurity of the "de facto" situation of judicial inferiority. Also, for **continuing damages** to the minor, valued at \$ \$500,000.00, *Hernández v. Matanzo*, 34 D.P.R. 755 (1925); *The Powerlite of Puerto Rico v. C.R.U.V.*, 115 D.P.R. 654 (1984); *Velázquez Lozada v. Ponce Asphalt, Inc.*, 113 D.P.R. 39, 48 (1982); *Betances v. Autoridad de Transporte*, 73 D.P.R. 223, 225 (1952); caused by Judge Ortiz by virtue of her pettifogging sentence to 90 hours of community service, and null for absence of jurisdiction, as of September 7, 2011; who depended more on me than on his father to provide follow-up to his daily routine of behavioral and pharmacological treatments, which the father always obstructed, sabotaged and slandered; and the medical appointments with private specialists not covered by the P.R.O.S.A.M. Health Insurance Plan, nor the services of the Special Education Program; along with other medical specialists paid by me. I never consented to a family relations plan with Joint Custody nor did I consent to the terms and conditions of the pettifogging sentence. Magistrate Ortiz acted *ultra vires*, failing to comply with her legal obligation, as ordered by **Article 54 of the 2004 Penal Code**. To wit, "*the conditions of the service and duration of same must be accepted by the convict prior to sentencing.*" In addition, at the time she subjected me, unilaterally and arbitrarily, to the rigors of a criminal sentence regulated by the Puerto Rico Department of Corrections and Rehabilitation, I was insured by the **State Insurance Fund Corporation**, Law 83 of October 20, 1992; against

accidents in the workplace: physical, moral, financial and emotional damages, occurring while providing **volunteer services**. These violations of our **Rights to Liberty and Property**, *Board of Regents v. Roth, supra*; that resulted in my unjust and illegal incarceration and the abusive loss of the custody of my son, have caused continuing damages to our emotional health and security valued at \$ 1,985,000.00. Also causing punitive damages for maliciously trampling our civil rights, valued at \$ 2,000,000.00.

(32) For the Mayagüez Court, through Judge **Lynette Ortiz-Martínez**, having undermined my **earning capacity**, *Earl v. Bouchard Transportation Co.*, 735 F. Supp. 1167, 1172 (1990); relative to occupation and life skills, *Wheeler Tarpeh-Doe v. U.S.*, 771 F. Supp. 427 (1991); *Mitchels v. U.S.*, 815 F. Supp. 1244 (1993); *Davis of City of New York*, 693 NY S. 2d 230 (2002); damages valued at \$ 500,000.00; for depriving me of my right to property without due process of law, *Board of Regents v. Roth, supra*; *In re Ríos Ríos*, 175 D.P.R. 75 (2008); *In re Ruffalo*, 390 U.S. 544, 550 (1968); in its corollary to practice the profession of attorney in the future. Maliciously and intentionally raising discrimination against me due to social condition, through academic discrimination, *Selosse v. Universidad Educativa Ana G. Méndez*, 122 D.P.R. 534 (1988); *Santiago v. E.L.A.*, 2005 WL 2622800; by sending fabricated reports about my unjust and illegal incarceration and procedural misfortunes at the Mayagüez Court; to the Puerto Rico Supreme Court and the Examining Board for Candidates to the Legal Profession, in order to create academic discrimination against me, in violation of the **equal protection under the law of the Fifth and Fourteenth Amendments**; damages valued at \$ 365,000.00. In addition

for mental anguish valued at \$ \$820,000.00 .

(33) For malicious persecution by Attorney Nasser Taha, with prior censorship, *Aponte v. Lugo*, 100 D.P.R. 282 (1971); *Asoc. de Medicina Podiátrica v. Dr. Romero Bassó*, 2002 T.S.P.R. 80; under color of authority, *Leyva v. Aristud*, *supra*; as the husband of Judge Lynette Ortiz-Martínez, in violation of my Right to Freedom of Expression, *Ranking v. Mcpherson*, 107 S. Ct. 2891; *New York Times v. Sullivan*, *supra*; *Landmark Comm. v. Va.*, *supra*; and of my Right of Intimacy, in its corollary "against unreasonable searches and seizures," *US v. Mendenhall*, 446 US 544 (1980); *Katz v. United States*, 389 US 347, 350 (1967); damages valued at \$ \$765,000.00 . Also, for threatening to deprive me of practicing the law, through District Attorney Esteban Miranda, which has the effect of depriving me of my Right to Property, *Board v. Roth*, *supra*; without due process of law, in its corollary right to exercise a profession and to the pursuit of happiness, without Due Process of Law; Fourteenth Amendment; monetary damages for violation of my civil rights, valued at \$ \$279,000.00 and mental anguish, valued at \$ \$290,000.00 .

(34) For loss of future earnings (*lucrum cessans*), *Velázquez Lozada v. Ponce Asphalt*, Inc., 113 D.P.R. 39 (1992); valued at \$ \$460,000.00 ; by significantly undermining my earning potential and desire to continue working in the same school scenario where I have worked since the year 1999, for which I am qualified as a School Counselor Licensed for Life, as a School Director and teacher; since the Mayagüez Court contaminated my workplace environment with the presence of police officers and bailiffs looking for me, and dramatic and continuous summons; without concern for the impression this might

to continuing damages, valued at \$ \$460,000.00; *Hernández v. Matanzo*, 34 D.P.R. 755 (1925); *The Powerlite of Puerto Rico v. CRUV*, 115 D.P.R. 654 (1984); *Velázquez Lozada v. Ponce Asphalt, Inc.*, 113 D.P.R. 39, 48 (1982); *Betances v. Autoridad de Transporte*, 73 D.P.R. 223, 225 (1952); for decreasing my opportunity to amortize my student loans sooner, damages valued at \$ \$415,799.00. In addition, Attorney Nasser Taha, husband of Judge Ortiz, threatened, through District Attorney Miranda, to apply all of the canons of ethics against me so that I could never practice as an attorney. All acting in solidarity and **conspiracy**, pursuant to Article 249 of the 2004 Penal Code, *supra*; to strip me of my Right to academic Property, valued at \$ \$250,000.00; without due process of law, affecting my life and that of my son in different areas: academic, health and quality of life, by intentionally working to limit my opportunity to practice the profession and generate greater income; frustrate the financial sacrifice of several student loans; continuing damages valued at \$ \$350,000.00. For making me the object of mockery at work, in the community and at church through constant malicious comments, through which many people assured me that "*I will never be a lawyer*"; successive damages valued at \$ \$295,000.00; causing me mental anguish valued at \$ \$300,250.00, for the fear, frustration, uneasiness and anxiety of thinking that, finally, after so many sacrifices and delayed gratification, I would be deprived of my Right to Property to exercise the profession of attorney because other members of the profession had damaged my reputation and persecuted me through dramatic and frequent summons at my workplace; in a malicious persecution, with damages valued at \$ \$795,000.00 and moral damages

cause on third (3<sup>rd</sup>) parties (students, parents, and teachers). By virtue of the información leaked from the Mayagüez Court, by telephone, to my workplace, simultaneous to my arrest and incarceration on December 14, 2011, which affected my professional image and put me in the humiliating and shameful position of having to vindicate to students and teachers, because in my work I constantly handle sensitive cases, that jail had not changed my rectitude and commitment to confidentiality. I felt betrayed, ridiculed and utterly humiliated, and it disturbed my peace of mind, for the damages caused to my honor and reputation, and my personal dignity, valued at \$ \$180,000.00. I also felt deeply hurt, humiliated and a victim of "bullying" by the Mayagüez Court, having been used to zealously keeping my personal and family life out of the workplace. In this way, my workplace was contaminated, injuring my right of intimacy, *Lasso v. Iglesia Pentecostal La Nueva Jerusalén*, 129 D.P.R. 284 (1991); for which I had to take a leave through the State Insurance Fund, since May 2012, damages valued at \$ \$170,000.00; for suffering y mental anguish valued at \$ \$190,000.00. For continuing damages valued at \$ \$145,000.00 and successive damages valued at \$ \$143,000.00.

(35) In addition to the damage caused by the Mayagüez Court for past loss of income, *Hernández v. Matanzo*, 34 D.P.R. 755 (1925); *The Powerlite of Puerto Rico v. C.R.U.V.*, 115 D.P.R. 654, (1984); *Velázquez Lozada v. Ponce Asphalt, Inc.*, 113 D.P.R. 39, 48 (1982); *Betances v. Autoridad de Transporte*, 73 D.P.R. 223, 225 (1952); valued at \$ \$375,000.00; for unearned income lost as a result of the damage caused by my unjust and illegal incarceration, as I have had to completely paralyze my work as a School Counselor, taking an unpaid

leave under the **State Insurance Fund**, 11 L.P.R.A. 1; Law 83 of October 29, 1992; since Thursday, May 10, 2012; having used all of my sick time.

(36) For defendant **ATTORNEYS**; and their respective wives and marital partnerships, as mentioned in this complaint. To wit: **Attorney Luis Vera-Muñoz**, **Attorney Norma Pérez-Muñiz**, **Attorney Ángel García-Troche**, **Attorney Edgardo Delgado-Brás**, and **Attorney Ernesto Delgado-Soto, Jr.**, causing us moral damages for breach of contract for competent legal services, valued at **\$125,000.00**; **Rivera Pérez v. Pan American Grain MFG.** KLAN 95-00094, October 5, 1995; **Ramírez Valentín v. Acad. San Antonio de Guayama** KLAN 98-00316, December 21, 1998; **Vélez García v. Molina Picorelli**, 2004 WL 2419013 (TCA); KLAN 03-00355, August 30, 2004; **Rubio Martínez v. Carlos Guillermo**, KLAN 97-003364, December 23, 1997; according to legal interest current on the date of execution of the contract for professional services. By virtue of their "indolence, lack of concern, inaction and indifference," **In re Laborde Freyre**, 159 D.P.R. 697 (2003); **In re Díaz Santiago**, 164 D.P.R. 41 (2005); **In re Ortiz Hernández**, 155 D.P.R. 341 (2002). Causing us moral damages for mental anguish valued at **\$130,000.00**; for their grave negligence and careless indifference, lack of honesty disguised as daring enlightenment, haughtiness and arrogance, in handling the case; attitudes that had an impact on the violation of our constitutional guarantees. So as not to lose favor with the Mayagüez Court, defendant **attorneys** preferred to act in violation of the **fiduciary relationship of loyalty** to the interests of the client, depriving us of a vigorous defense and failing to raise the appropriate defenses, such as: answering the multiple motions of Attorney Olga Longoria-Vélez, who through

*Certified Translation*

**COMMONWEALTH OF PUERTO RICO  
COURT OF FIRST INSTANCE  
MAYAGÜEZ SUPERIOR DIVISION**

**LETTER SENDING FILE AS TRANSFER**

HUMACAO JUDICIAL CENTER  
OFFICE OF THE CLERK OF  
FAMILY RELATIONS  
PO BOX 885  
HUMACAO, PR 0092-0885

Mr/Madam Clerk

**RE: ANIBAL RODRIGUEZ GARCIA V. MAYRA I. FELICIANO ROSADO**

Dear Sir/Madam:

Pursuant to the Order to Transfer of the *Hon. Josian J. Rivera Torres*, approval is granted and the immediate transfer of the referenced case is ordered to the Court of First Instance, Humacao Superior Division, since it is within its jurisdiction.

In Mayagüez, Puerto Rico, on September 21, 2015.

[Signed]  
**AIXA ROSADO PIETRI  
REGIONAL ADMINISTRATIVE JUDGE**

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

*Annie Flores*

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

ARP/mc

*Certified Translation*

COMMONWEALTH OF PUERTO RICO  
COURT OF FIRST INSTANCE  
MAYAGÜEZ JUDICIAL CENTER  
SUPERIOR DIVISION

ANIBAL RODRIGUEZ GARCIA  
(Plaintiff)

v.

MAIRA I. FELICIANO ROSADO  
(Defendant)

CIVIL NO.: ISRF200601752

RE:

DIVORCE (I/B)

**ORDER TO TRANSFER**

It appears satisfactorily from the record that this case is within the jurisdiction of the Court of First Instance, Humacao Superior Division, this Court, on its own initiative and in the exercise of the authority conferred to it by Article 5.005 of the Judiciary Act of the Commonwealth of Puerto Rico of 2003, Administrative Order No. OAN 2003-10, issued on November 18, 2003, by the Acting Presiding Judge, Hon. Francisco Rebollo López, and Rule 3 of the Rules of Civil Procedure of 2009, orders the transfer of the same to said Division.

Once this Order has been entered the clerk shall send all the briefs filed in this case to the Clerk of said Division.

**TO BE NOTIFIED.**

Given in Mayagüez, Puerto Rico, on August 31, 2015.

[Signed]

JOSIAN J. RIVERA TORRES  
SUPERIOR COURT JUDGE

/mom

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

COMMONWEALTH OF PUERTO RICO  
GENERAL COURT OF LAW  
COURT OF FIRST INSTANCE  
MAYAGÜEZ DIVISION  
COURTROOM 301

RODRIGUEZ GARCIA, ANIBAL  
PLAINTIFF  
V.  
FELICIANO ROSADO, MAYRA  
DEFENDANT

CASE NO: ISRF200601752

RE: IRRETRIEVABLE BREAKDOWN

TO:

NOTIFICATION

I CERTIFY: THAT ON AUGUST 31, 2015, THE COURT ISSUED THE ATTACHED ORDER TO TRANSFER.

I ALSO CERTIFY THAT TODAY I MAILED A COPY OF THIS NOTIFICATION TO THE FOLLOWING PERSONS AT THEIR ADDRESSES ON RECORD, HAVING FILED ON THIS SAME DATE A COPY OF THIS NOTIFICATION IN THE RECORD OF THE CASE.

ATTY. OLGA LONGORIA VELEZ  
149 ENRIQUE VAZQUEZ BAEZ  
MAYAGÜEZ PR 00680

MAYRA FELICIANO ROSADO  
PO BOX 4471, AGUADILLA, PR 00603

ATTY. CYNTHIA E. VAZQUEZ ESTRADA  
PO BOX 577, HUMACAO, PR 00792

ANIBAL RODRIGUEZ GARCIA  
PO BOX 261, LAS PIEDRAS, PR 00771

HUMACAO JUDICIAL CENTER  
PO BOX 885, HUMACAO, PR 00791

MAYAGÜEZ, PUERTO RICO, ON OCTOBER 01, 2015.

-CERTIFIED-

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores  
Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

ATTY. NORMA G. SANTANA IRIZARRY  
CLERK  
[Signed]  
BY: ROSA REYES LAGUER  
CLERK OF COURT I

*Certified Translation*

COMMONWEALTH OF PUERTO RICO  
GENERAL COURT OF LAW  
COURT OF FIRST INSTANCE  
MAYAGÜEZ DIVISION  
COURTROOM 301

OCTOBER 01, 2015

RE: CASE NO.: ISRF200601752

RODRIGUEZ GARCIA, ANIBAL  
V.  
FELICIANO ROSADO, MAIRA

RE: IRRETRIEVABLE BREAKDOWN

DEAR SIR (MADAM):

IN ACCORDANCE WITH THE ORDER TO TRANSFER ISSUED BY THE HONORABLE JUDGE JOSIAN J. RIVERA TORRES ON AUGUST 31, 2015, I AM SENDING YOU THE FILE OF THE ABOVE-CAPTIONED CASE.

I WOULD APPRECIATE YOUR SENDING ACKNOWLEDGMENT OF RECEIPT OF THE SAME, STATING THE NUMBER WITH WHICH IT HAS BEEN FILED IN THAT DIVISION.

CORDIALLY,

ATTY. NORMA G. SANTANA IRIZARRY  
CLERK  
*/s/ Rosa I. Reyes Laguer*  
BY: ROSA REYES LAGUER  
COURT CLERK I

ANIBAL RODRIGUEZ GARCIA  
PO BOX 261, LAS PIEDRAS, PR 00771

ATTY. OLGA LONGORIA VELEZ  
149 ENRIQUE VAZQUEZ BAEZ  
MAYAGÜEZ PR 00680

MAYRA FELICIANO ROSADO  
PO BOX 4471  
AGUADILLA, PR 00603

ATTY. CYNTHIA E. VAZQUEZ ESTRADA  
PO BOX 577, HUMACAO, PR 00792

HUMACAO JUDICIAL CENTER  
PO BOX 885, HUMACAO, PR 00791

-CERTIFIED-

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

OAT 747 – LETTER SENDING FILE

CONT. CASE NO. ISRF200601752

*Certified Translation*

COMMONWEALTH OF PUERTO RICO  
GENERAL COURT OF LAW  
COURT OF FIRST INSTANCE  
MAYAGÜEZ DIVISION  
COURTROOM 301

OCTOBER 01, 2015

MAYRA FELICIANO ROSADO  
PO BOX 4471  
AGUADILLA, PR 00603

RE: CASE NO.: ISRF200601752

RODRIGUEZ GARCIA, ANIBAL  
V.  
FELICIANO ROSADO, MAIRA

RE: IRRETRIEVABLE BREAKDOWN

DEAR SIR (MADAM):

IN ACCORDANCE WITH THE ORDER TO TRANSFER ISSUED BY THE HONORABLE JUDGE JOSIAN J. RIVERA TORRES ON AUGUST 31, 2015, I AM SENDING YOU THE FILE OF THE ABOVE-CAPTIONED CASE.

I WOULD APPRECIATE YOUR SENDING ACKNOWLEDGMENT OF RECEIPT OF THE SAME, STATING THE NUMBER WITH WHICH IT HAS BEEN FILED IN THAT DIVISION.

CORDIALLY,

ATTY. NORMA G. SANTANA IRIZARRY  
CLERK  
*/s/ Rosa I. Reyes Laguer*  
BY: ROSA REYES LAGUER  
COURT CLERK I

ANIBAL RODRIGUEZ GARCIA  
PO BOX 261, LAS PIEDRAS, PR 00771

ATTY. OLGA LONGORIA VELEZ  
149 ENRIQUE VAZQUEZ BAEZ  
MAYAGÜEZ PR 00680

ATTY. CYNTHIA E. VAZQUEZ ESTRADA  
PO BOX 577, HUMACAO, PR 00792

HUMACAO JUDICIAL CENTER  
PO BOX 885, HUMACAO, PR 00791

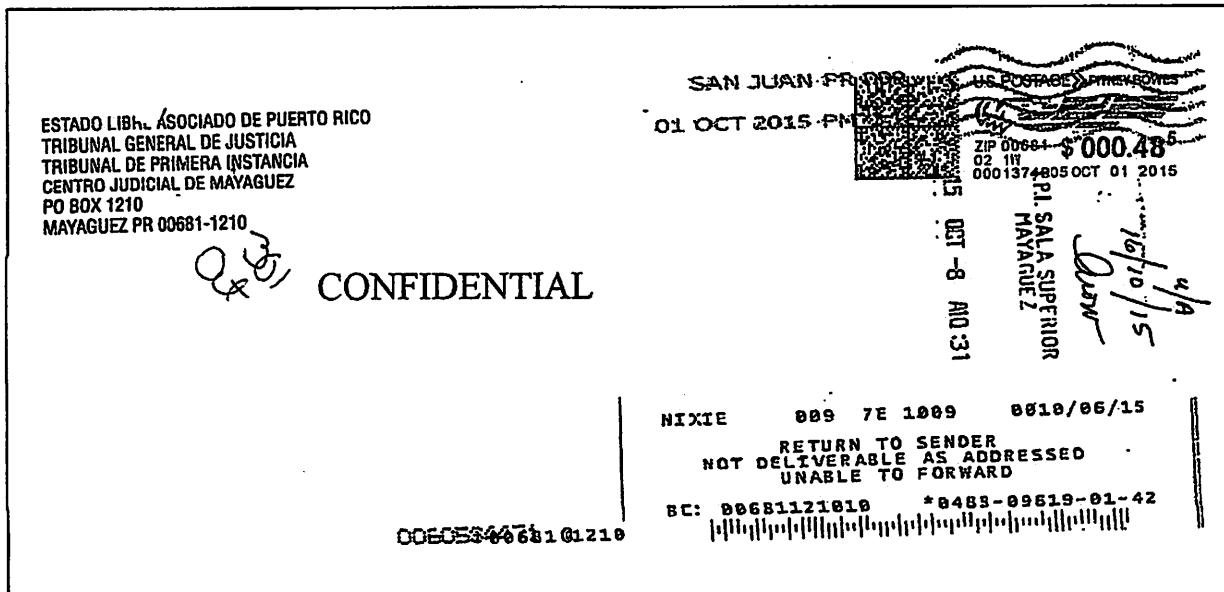
-CERTIFIED-

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores  
Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

OAT 747 – LETTER SENDING FILE AS TRANSFER – (REV. MAY 1992)

### *Certified Translation*



*Certified Translation*

**COMMONWEALTH OF PUERTO RICO  
COURT OF FIRST INSTANCE  
MAYAGÜEZ SUPERIOR DIVISION  
MAYAGÜEZ, PUERTO RICO**

**ANÍBAL RODRÍGUEZ GARCÍA**  
Plaintiff

**V,**

**MAYRA FELICIANO ROSADO**  
Defendant

**CIVIL NO.: ISRF200601752**

**RE:**

**DIVORCE: (I.B.)**

**C E R T I F I C A T I O N**

I, Norma G. Santana Irizarry, Regional Clerk of the Court of First Instance, Mayagüez Superior Division, Puerto Rico, **CERTIFY** that the above-captioned file consists of **THREE VOLUMES** and contains **SEVEN HUNDRED EIGHTY-NINE (789) FOLIOS**, numbered consecutively, which I am sending as a transfer, pursuant to the order issued by the Hon. Aixa Rosado Pietri, Regional Administrative Judge, to the Court of First Instance, **Humacao Superior Division**, Puerto Rico, for the corresponding action.

In Mayagüez, Puerto Rico, on October 2, 2015.

**NORMA G. SANTANA IRIZARRY**  
Regional Clerk II  
[Signed]  
**By: Rosa I. Reyes Laguer**  
Confidential Clerk of Court I

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

**COMMONWEALTH OF PUERTO RICO  
COURT OF FIRST INSTANCE  
MAYAGÜEZ SUPERIOR DIVISION  
COURTROOM 302**

October 6, 2015

Humacao Judicial Center  
PO BOX 885  
Humacao, PR 00792-0885

Dear Sir/Madam:

**RE: ISRF200601752  
ANIBAL RODRIGUEZ GARCIA V. MAYRA FELICIANO ROSADO**

In accordance with the Order to Transfer issued August 31, 2015, by the Hon. Josian J. Rivera Torres, Superior Court Judge, I am sending you the file of the aforementioned case, as a transfer.

[Initials] *MOR*

**By: Maira E. Ortiz Rosario  
Deputy Clerk of Court I**

Attachment

Received by: Nayda M. Rodríguez Rodríguez

Date: Oct./6/2015  
(Internal mail)

Received by: \_\_\_\_\_

Date: \_\_\_\_\_  
(OAT mail)

Received by: \_\_\_\_\_

Date: \_\_\_\_\_

Case number in that Court: \_\_\_\_\_  
(Transfer Court)

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

*Annie Flores*

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

Commonwealth of Puerto Rico  
COURT OF FIRST INSTANCE  
HUMACAO SUPERIOR DIVISION  
FAMILY RELATIONS AND MINORS AFFAIRS COURT

**ANIBAL RODRIGUEZ GARCIA**  
PLAINTIFF

CIVIL NO.: **HSRF201601308**

V,

**RE: CHILD SUPPORT**

**MAYRA FELICIANO ROSADO**  
DEFENDANT

COURTROOM: **303**

**ORDER**

After examining the 'Motion Requesting the Dismissal of the Motion in Aid of Jurisdiction of ASUME [Child Support Enforcement Administration] and Requesting the Stay of the Collection of Child Support", filed on January 19, 2017, by defendant, the Court provides the following:

- The Motion to Dismiss or Stay of the Collection of Child Support, is DENIED.
- All issues related to custody and parental rights shall not be addressed in a child support case. It must be filed in the appropriate case, which in this case is **HSRF201501224**.
- In case HSRF201501244, it appears that defendant was deprived of the patria potestas [legal custody] of the minor, therefore, as to the request for order prohibiting the minor from leaving the Island, it is Denied. See Resolution of July 12, 2013.
- The other party must state, within ten (10) days his position in relation to the request for custody and patria potestas [legal custody] made by defendant.
- The attachments are separated, and must be picked up by defendant since

*Certified Translation*

they are part of the file and part of them are subject to discovery of evidence and not to be presented by motion.

- Mrs. Feliciano is advised that this Court is precluded from reviewing determinations made by a court of equal standing, therefore, she must stop making statements about the previous process, since that is res judicata. If you wish custody, patria potestas or parent-child relations to be reinstated, your request must be under the current situation and not according to what you understand should have happened in the other case in which you decided at that time not to appear.
- If you consider that the child support payment should be reviewed, you must file the corresponding motion.

**NOTIFY the parties and the ASUME attorney.**

In Humacao, Puerto Rico, on January 24, 2017.

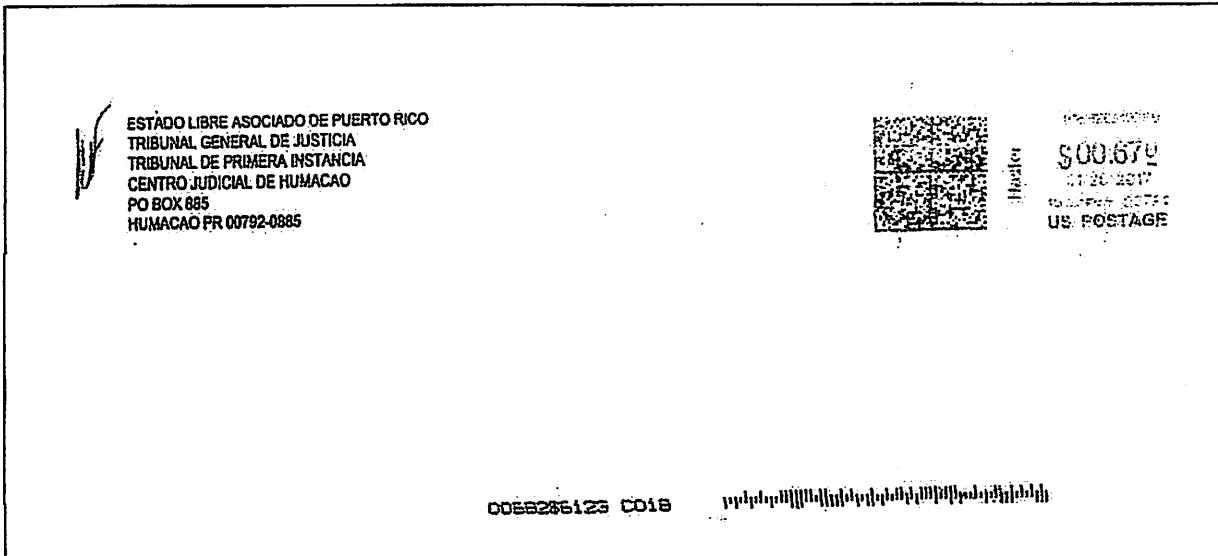
[Signed]  
**MARILUZ CRUZ MORALES**  
SUPERIOR COURT JUDGE

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation



***Certified Translation***

COMMONWEALTH OF PUERTO RICO  
GENERAL COURT OF LAW  
COURT OF FIRST INSTANCE  
HUMACAO SUPERIOR DIVISION

RODRIGUEZ GARCIA, ANIBAL  
PLAINTIFF  
V.  
FELICIANO ROSADO, MAYRA  
DEFENDANT

CASE NO. HSRF201601308  
COURTROOM NO. 303

RE:  
REQUEST TO ENFORCE ASUME  
[CHILD SUPPORT ENFORCEMENT  
ADMINISTRATION] ORDER

TO: FELICIANO ROSADO, MAYRA  
BO MANI  
154 ELENA SEGARRA STREET  
MAYAGÜEZ PR 00680

**NOTIFICATION**

ATTY. CAMILLE RODRIGUEZ ACOSTA  
PO BOX 8958  
HUMACAO PR 00792

CHILD SUPPORT ENFORCEMENT ADMINISTRATION [ASUME]  
ATTY. CYNTHIA E. VAZQUEZ ESTRADA  
PO BOX 577  
HUMACAO PR 00792-0577

THE UNDERSIGNED CLERK CERTIFIES AND NOTIFIES YOU THAT IN RELATION TO THE MOTION REQUESTING THE DISMISSAL OF THE MOTION IN AID OF JURISDICTION OF ASUME AND REQUESTING STAY OF COLLECTION OF CHILD SUPPORT, THIS COURT ISSUED AN ORDER ON JANUAR 24, 2017.

A COPY IS ATTACHED OR A LINK IS INCLUDED:

SGD. MARILUZ CRUZ MORALES  
SUPERIOR COURT JUDGE

YOU ARE ADVISED THAT YOU BEING A PARTY OR LEGAL REPRESENTATIVE IN THE CASE SUBJECT TO THIS ORDER, YOU MAY FILE AN APPEAL, REVIEW OR CERTIORARI, ACCORDING TO THE PROCEDURE AND IN THE TERM ESTABLISHED BY LAW, RULE OR REGULATION.

I HEREBY CERTIFY THAT THE RULING ISSUED BY THE COURT WAS DULY ENTERED AND FILED TODAY, JANUARY 26, 2017, AND THAT A COPY OF THIS NOTICE WAS SENT TO THE PERSONS STATED ABOVE, AT THEIR ADDRESSES ON RECORD IN THE CASE, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS. ON THIS SAME DATE, A COPY OF THIS NOTICE WAS FILED IN THE COURT FILE.

IN HUMACAO, PUERTO RICO, ON JANUARY 26, 2017.

***Certified Translation***

DOMINGA GOMEZ FUSTER  
NAME OF REGIONAL CLERK

By: /s/ NICSIA M. MARTINEZ RIVERA  
NAME AND SIGNATURE OF DEPUTY  
CLERK OF COURT

OAT1812 – Single Notification Form – Judgments, Resolutions, Orders and Minutes (November 2016)

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

Commonwealth of Puerto Rico  
COURT OF FIRST INSTANCE  
HUMACAO SUPERIOR COURT  
FAMILY RELATIONS AND MINORS AFFAIRS DIVISION

**ANÍBAL RODRÍGUEZ GARCÍA**  
PLAINTIFF

V,

**MAYRA FELICIANO ROSADO**  
DEFENDANT

CIVIL NO.: **HSRF201501224**

RE: **DIVORCE**

COURTROOM: **303**

**ORDER**

The Court, after examining the above-captioned file, orders the following:

- It is requested that the **Mayagüez Court** transfer file **ISRF200601755**, to the Humacao Court.
- Once received, it is ordered that it be attached to this case.

**TO BE NOTIFIED.**

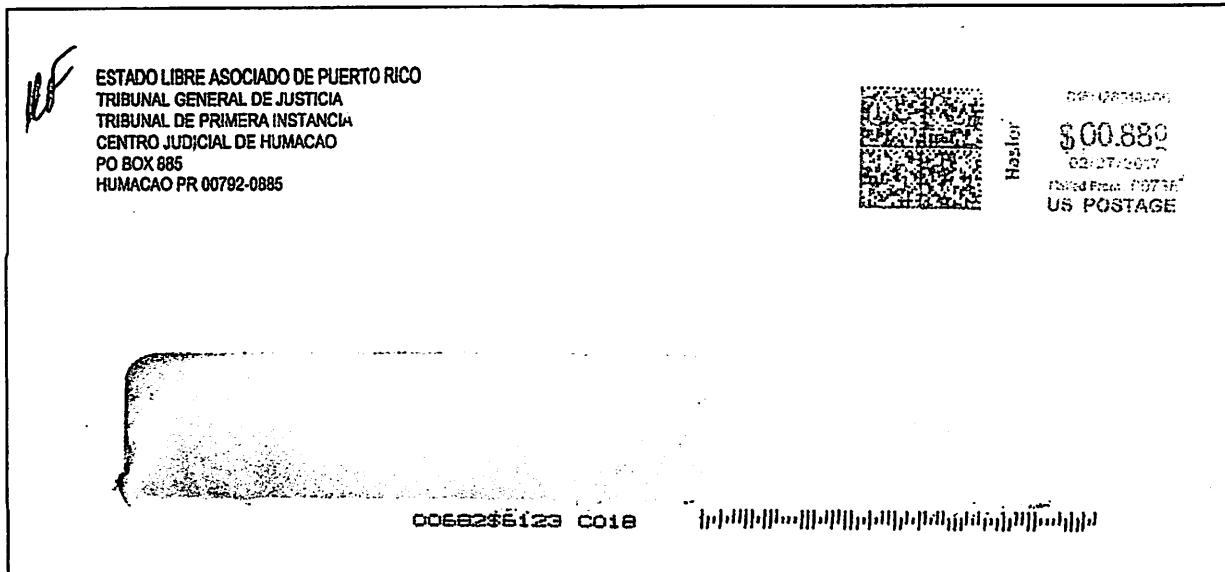
In Humacao, Puerto Rico, on **February 23, 2017**.

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores  
Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

[Signed]  
**MARILUZ CRUZ MORALES**  
SUPERIOR COURT JUDGE



***Certified Translation***

COMMONWEALTH OF PUERTO RICO  
GENERAL COURT OF LAW  
COURT OF FIRST INSTANCE  
HUMACAO SUPERIOR DIVISION

RODRIGUEZ GARCIA, ANIBAL  
PLAINTIFF  
V.  
FELICIANO ROSADO, MAYRA  
DEFENDANT

CASE NO. HSRF201501224  
COURTROOM NO. 303  
RE:  
IRRETRIEVABLE BREAKDOWN

TO: FELICIANO ROSADO, MAYRA  
EL MANI SECTOR  
154 ELENA SEGARRA  
MAYAGÜEZ PR 00680

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

NOTIFICATION

ATTY. FRANCIS EMANUE RUIZ RAMÍREZ,  
PO BOX 1302  
LAS PIEDRAS PR 00771

THE UNDERSIGNED CLERK CERTIFIES AND NOTIFIES YOU THAT IN RELATION TO THE  
ABOVE-CAPTIONED CASE, THIS COURT ISSUED AN ORDER ON FEBRUARY 23, 2017.

A COPY IS ATTACHED OR A LINK IS INCLUDED:

SGD. MARILUZ CRUZ MORALES  
SUPERIOR COURT JUDGE

YOU ARE ADVISED THAT YOU BEING A PARTY OR LEGAL REPRESENTATIVE IN THE CASE  
SUBJECT TO THIS ORDER, YOU MAY FILE AN APPEAL, REVIEW OR CERTIORARI,  
ACCORDING TO THE PROCEDURE AND IN THE TERM ESTABLISHED BY LAW, RULE OR  
REGULATION.

I HEREBY CERTIFY THAT THE RULING ISSUED BY THE COURT WAS DULY ENTERED AND  
FILED TODAY, FEBRUARY 27, 2017, AND THAT A COPY OF THIS NOTICE WAS SENT TO THE  
PERSONS STATED ABOVE, AT THEIR ADDRESSES ON RECORD IN THE CASE, IN  
ACCORDANCE WITH THE APPLICABLE REGULATIONS. ON THIS SAME DATE, A COPY OF  
THIS NOTICE WAS FILED IN THE COURT FILE.

IN HUMACAO, PUERTO RICO, ON FEBRUARY 27, 2017.

DOMINGA GOMEZ FUSTER  
NAME OF REGIONAL CLERK

By: /s/ NICSIA M. MARTINEZ RIVERA  
NAME AND SIGNATURE OF DEPUTY  
CLERK OF COURT

***Certified Translation***

COMMONWEALTH OF PUERTO RICO  
COURT OF FIRST INSTANCE  
MAYAGÜEZ SUPERIOR DIVISION

MAIRA I. FELICIANO ROSADO  
Plaintiff

Civil Number: ISRF200801755

V.

ANIBAL RODRIGUEZ GARCIA  
Defendant

Re: DIVORCE (CRUEL TREATMENT)

**ORDER TO TRANSFER**

In accordance with the Order issued on February 23, 2017, by the Hon. Mariluz Cruz Morales, in which the transfer of the file to the Humacao Superior Division is requested, this Court, on its own initiative and in the exercise of the power conferred to it by Article 5.005 of the Judiciary Act of the Commonwealth of Puerto Rico of 2003, as amended, Administrative Order No. OAN 2003-10, issued on November 18, 2003, by the Acting Presiding Judge, Hon. Francisco Rebollo López, and Rule 3 of the Rules of Civil Procedure of 2009, orders the transfer of the same to said Division.

Once this Order has been entered, the clerk shall send all the briefs filed in this case to the Clerk of said Division

TO BE NOTIFIED.

Given in Mayagüez, Puerto Rico, on March 8, 2017

[Signed]

VILMARY RODRIGUEZ PARDO  
SUPERIOR COURT JUDGE

**ORDER TO DISMISS DUE TO TRANSFER**

According to the Order issued on March 8, 2017, by Superior Court Judge, Hon. Vilmary Rodriguez Pardo, in which he ordered the transfer of this case to the Court of First Instance,

***Certified Translation***

Mayagüez Superior Division, this Court authorizes it and orders the continuation of the transfer procedure.

The Clerk of the Court is ordered to file this case for statistical purposes.

TO BE NOTIFIED.

Given in Mayagüez, Puerto Rico, on this 14<sup>th</sup> day of March, 2017.

[Signed]

LIND O. MERLE FELICIANO  
REGIONAL ADMINISTRATIVE JUDGE

-CERTIFIED-

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

COMMONWEALTH OF PUERTO RICO  
GENERAL COURT OF LAW  
COURT OF FIRST INSTANCE  
MAYAGÜEZ SUPERIOR DIVISION

FELICIANO ROSADO, MAYRA IVET  
PLAINTIFF  
V.  
RODRIGUEZ GARCIA, ANIBAL  
DEFENDANT

CASE NO. ISRF200601755  
COURTROOM NO. 301  
RE:  
CRUEL TREATMENT

TO: FELICIANO ROSADO, MAYRA IVET  
BO. MANI  
154 ELENA SEGARRA STREET  
MAYAGÜEZ PR 00680

**NOTIFICATION**

ATTY. OLGA LONGORIA VELEZ  
149 ENRIQUE VÁZQUEZ BAEZ  
MAYAGÜEZ PR 00680

HUMACAO JUDICIAL CENTER  
FAMILY AND MINOR RELATIONS  
PO BOX 885  
HUMACAO PR 00792-0885

THE UNDERSIGNED CLERK CERTIFIES AND NOTIFIES YOU THAT IN RELATION TO THE ABOVE-CAPTIONED CASE, THIS COURT ISSUED AN ORDER ON MARCH 08 2017..

THE DECISION IS TRANSCRIBED BELOW:

REFER TO THE CONSIDERATION OF THE ADMINISTRATIVE JUDGE.

SGD. VILMARY RODRIGUEZ PARDO  
JUDGE

YOU ARE ADVISED THAT YOU BEING A PARTY OR LEGAL REPRESENTATIVE IN THE CASE SUBJECT TO THIS ORDER, YOU MAY FILE AN APPEAL, REVIEW OR CERTIORARI, ACCORDING TO THE PROCEDURE AND IN THE TERM ESTABLISHED BY LAW, RULE OR REGULATION.

I HEREBY CERTIFY THAT THE RULING ISSUED BY THE COURT WAS DULY ENTERED AND FILED TODAY, MARCH 16, 2017, AND THAT A COPY OF THIS NOTICE WAS SENT TO THE PERSONS STATED ABOVE, AT THEIR ADDRESSES ON RECORD IN THE CASE, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS. ON THIS SAME DATE, A COPY OF THIS NOTICE WAS FILED IN THE COURT FILE.

NOTES TO THE CLERK:

IN RELATION TO THE ORDER OF THE HUMACAO COURT TO TRANSFER FILE TO THAT REGION

***Certified Translation***

COMMONWEALTH OF PUERTO RICO  
GENERAL COURT OF LAW  
COURT OF FIRST INSTANCE  
MAYAGÜEZ SUPERIOR DIVISION

FELICIANO ROSADO, MAYRA IVET  
PLAINTIFF  
V.  
RODRIGUEZ GARCIA, ANIBAL  
DEFENDANT

CASE NO. ISRF200601755  
COURTROOM NO. 301  
RE:  
CRUEL TREATMENT

TO: FELICIANO ROSADO, MAYRA IVET  
BO. MANI  
154 ELENA SEGARRA STREET  
MAYAGÜEZ PR 00680

**NOTIFICATION**

ATTY. OLGA LONGORIA VÉLEZ  
149 ENRIQUE VAZQUEZ BAEZ  
MAYAGÜEZ PR 00680

HUMACAO JUDICIAL CENTER  
FAMILY AND MINOR RELATIONS  
PO BOX 885  
HUMACAO PR 00792-0885

THE UNDERSIGNED CLERK CERTIFIES AND NOTIFIES YOU THAT IN RELATION TO THE ABOVE-CAPTIONED CASE, THIS COURT ISSUED AN ORDER ON MARCH 14, 2017..

A COPY IS ATTACHED OR A LINK IS INCLUDED:

SGD. VILMARY RODRIGUEZ PARDO  
JUDGE

YOU ARE ADVISED THAT YOU BEING A PARTY OR LEGAL REPRESENTATIVE IN THE CASE SUBJECT TO THIS ORDER, YOU MAY FILE AN APPEAL, REVIEW OR CERTIORARI, ACCORDING TO THE PROCEDURE AND IN THE TERM ESTABLISHED BY LAW, RULE OR REGULATION.

I HEREBY CERTIFY THAT THE RULING ISSUED BY THE COURT WAS DULY ENTERED AND FILED TODAY, MARCH 16, 2017, AND THAT A COPY OF THIS NOTICE WAS SENT TO THE PERSONS STATED ABOVE, TO THEIR ADDRESSES ON RECORD IN THE CASE, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS. ON THIS SAME DATE, A COPY OF THIS NOTICE WAS FILED IN THE COURT FILE.

NOTES TO THE CLERK:  
ORDER TO TRANSFER  
ORDER TO DISMISS DUE TO TRANSFER

***Certified Translation***

IN MAYAGÜEZ, PUERTO RICO, ON MARCH 16, 2017.

ATTY. NORMA G. SANTANA IRIZARRY

By: /s/ ROSA REYES LAGUER

---

NAME OF REGIONAL CLERK

/s/ Rosa I. Reyes Laguer, Court Clerk I

NAME AND SIGNATURE OF DEPUTY  
CLERK OF COURT

OAT1812 – Single Notification Form – Judgments, Resolutions, Orders and Minutes (November 2016)

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

COMMONWEALTH OF PUERTO RICO  
GENERAL COURT OF LAW  
COURT OF FIRST INSTANCE  
MAYAGÜEZ DIVISION  
COURTROOM 301

MARCH 16, 2017

MAIRA IVET FELICIANO ROSADO  
BO. MANI  
154 ELENA SEGARRA STREET  
MAYAGÜEZ PR 00680

RE: CASE NO.: ISRF200601755

FELICIANO ROSADO, MAIRA IVET  
V.  
RODRIGUEZ GARCIA, ANIBAL

RE: CRUEL TREATMENT

DEAR SIR (MADAM):

IN ACCORDANCE WITH THE ORDER TO TRANSFER ISSUED BY THE HONORABLE JUDGE VILMARY RODRIGUEZ PARDO ON MARCH 14, 2017, I AM SENDING YOU THE FILE OF THE ABOVE-CAPTIONED CASE.

I WOULD APPRECIATE YOUR SENDING ACKNOWLEDGMENT OF RECEIPT OF THE SAME, STATING THE NUMBER WITH WHICH IT HAS BEEN FILED IN THAT DIVISION.

CORDIALLY,

ATTY. NORMA G. SANTANA IRIZARRY  
CLERK

*/s/ Rosa I. Reyes Laguer*  
BY: ROSA REYES LAGUER  
COURT CLERK I

ATTY. OLGA LONGORIA VÉLEZ  
149 ENRIQUE VÁZQUEZ BAEZ  
MAYAGÜEZ PR 00680

-CERTIFIED-

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

*Annie Flores*

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

OAT 747 – LETTER SENDING FILE AS TRANSFER (REV. MAY 1992)

***Certified Translation***

IN MAYAGÜEZ, PUERTO RICO, ON MARCH 16, 2017.

ATTY. NORMA G. SANTANA IRIZARRY

By: /s/ ROSA REYES LAGUER

---

NAME OF REGIONAL CLERK

*/s/ Rosa I. Reyes Laguer, Court Clerk I*

---

NAME AND SIGNATURE OF  
DEPUTY CLERK OF COURT

OAT1812 – Single Notification Form – Judgments, Resolutions, Orders and Minutes (November 2016)

**-CERTIFIED-**

To be a correct translation prepared  
by me, to the best of my knowledge  
and ability.

*Annie Flores*

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

***Certified Translation***

ESTADO LIBRE ASOCIADO DE PUERTO RICO  
TRIBUNAL GENERAL DE JUSTICIA  
TRIBUNAL DE PRIMERA INSTANCIA  
CENTRO JUDICIAL DE MAYAGÜEZ  
PO BOX 1210  
MAYAGÜEZ PR 00681-1210



**CONFIDENTIAL**

00682\$6123 CO18

ପାତାରେ ପାତାରେ ପାତାରେ ପାତାରେ ପାତାରେ ପାତାରେ ପାତାରେ ପାତାରେ

*Certified Translation*

**Exhibit 9**

**COMMONWEALTH OF PUERTO RICO  
COURT OF FIRST INSTANCE  
MAYAGÜEZ JUDICIAL CENTER  
SUPERIOR COURT**

**ANIBAL RODRIGUEZ GARCIA  
PLAINTIFF**

**v.**

**MAIRA IVET FELICIANO ROSADO  
DEFENDANT**

**CASE NO. ISRF-2006-01752**

**COURTROOM NO. 301**

**RE: DIVORCE**

**INFORMATIVE MOTION**

**TO THE HONORABLE COURT:**

Comes now plaintiff, Anibal Rodríguez García, through the undersigned legal representative, and before this Honorable Court very respectfully States, Alleges and Prays:

1. This Honorable Court entered Order on September 18, 2012, in which the above-captioned case was scheduled for next January 2, 2012.

2. Plaintiff has made multiple efforts to serve the aforementioned summons through our process server, Mrs. Suhail Tollinchi, and they have been fruitless. (See Exhibit I)

3. In view of this situation, said summons was sent by certified mail with return receipt #7012 0470 0000 1409 7712. (See Exhibit II)

**WHEREFORE**, we request that this Honorable Court take notice of the foregoing.

**RESPECTFULLY SUBMITTED.**

**I CERTIFY:** Having sent a true and exact copy of the preceding motion to defendant, Mrs. Maira Feliciano Rosado, P.O. Box 4471, Aguadilla, Puerto Rico 00603-4471.

In Mayagüez, Puerto Rico, on this 17<sup>th</sup> day of December, 2012.

[Signed]

*Certified Translation*

OLGA LONGORIA VELEZ  
LONGORIA LAW OFFICES  
BAR ASSOC. MEMBER NO. 7822  
NOTARY PUBLIC 6557  
149 E. VAZQUEZ STREET  
MAYAGÜEZ, PUERTO RICO 00680  
TEL. AND FAX 265-1117

-CERTIFIED-

To be a correct translation  
prepared by me, to the best  
of my knowledge and ability

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

*Exhibit 9b*

**COMMONWEALTH OF PUERTO RICO  
COURT OF FIRST INSTANCE  
MAYAGÜEZ JUDICIAL CENTER  
SUPERIOR COURT**

**ANIBAL RODRIGUEZ GARCIA  
PLAINTIFF**

**v.**

**MAIRA IVET FELICIANO ROSADO  
DEFENDANT**

**CASE NO. ISRF-2006-01752  
COURTROOM NO. 301  
RE: DIVORCE**

**MOTION REQUESTING THAT SUMMONS FOR CHILD SUPPORT BE  
ISSUED TO BE PUBLISHED BY EDICT**

**TO THE HONORABLE COURT:**

Comes now plaintiff, Aníbal Rodríguez García, through the undersigned legal representative, and before this Honorable Court very respectfully States, Alleges and Prays:

1. This Honorable court entered orders on June 21, 2012 and August 14, 2012, wherein it summoned the parties for a provisional child support hearing on August 14 and September 6, 2012.

2. On both occasions our process server made efforts to serve the summons to defendant, but they were fruitless. (See Exhibit I)

3. In addition, defendant [sic] notified both orders by certified mail with return receipt #7008 1830 0003 6626 4918 and #7012 0470 0000 1409 7569, and today both envelopes were returned by the post office, since they were not claimed by defendant. (See Exhibit II)

4. Inasmuch as the orders to defendant were not served, this party requests that this Honorable Court issue the child support summons scheduled for September 6, 2012, to be published by edict.

**WHEREFORE**, we very respectfully request that this Honorable Court take notice of the foregoing and provide as requested.

**RESPECTFULLY SUBMITTED.**

**I CERTIFY:** Having sent today a true and exact copy of the preceding motion to

*Certified Translation*

defendant, Mrs. Maira Feliciano Rosado, P.O. Box 4471, Aguadilla, Puerto Rico 00603-4471.

In Mayagüez, Puerto Rico, on September 10, 2012.

[Signed]  
OLGA LONGORIA VELEZ  
LONGORIA LAW OFFICES  
BAR ASSOC. MEMBER NO. 7822  
NOTARY PUBLIC 6557  
149 E. VAZQUEZ STREET  
MAYAGÜEZ, PUERTO RICO 00680  
TEL. AND FAX 265-1117

**-CERTIFIED-**

To be a correct translation  
prepared by me, to the best  
of my knowledge and ability

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

***Exhibit 9c***

**SWORN STATEMENT**

I, **SUHAIL TOLLINCHI HOSTOS**, of legal age, single, process server and a resident of Añasco, Puerto Rico, state under oath:

1. That my name and other personal circumstances are the foregoing.
2. That on July 2, 2012, I received the child support summons in the case of Aníbal Rodríguez García v. Maira Feliciano Rosado, civil number ISRF-2006-01752.
3. That said case is summoned for next September 6, 2012.
4. That Mr. Aníbal Rodríguez informed me the address at 154 Elena Segarra Street, El Maní, Mayagüez, Puerto Rico, and told me that it was the residence of the parents of Mrs. Maira Feliciano Rosado, but that she was always there and that he did not know this party's current address.
5. That on July 16, 2012, at 4:09 in the afternoon, I visited the aforementioned residence and spoke with the parents of Mrs. Maira Feliciano Rosado, who informed me that she was not there and alleged that they did not know their daughter's address.
6. That the undersigned personally visited the aforesaid address on the following dates, but did not find Mrs. Maira Feliciano Rosado:

July 17, 2012, at 3:25 pm	July 18, 2012, at 6:15 pm
July 18, 2012, at 8:10 am	July 19, 2012, at 4:10 pm
July 18, 2012, at 11:40 am	July 20, 2012, at 3:40 pm
July 18, 2012, at 2:37 pm	July 24, 2012, at 3:10 pm
7. That on July 31, 2012, I visited the Pedro Perea Fajardo Vocational High School in Mayagüez, and the security guard told me that all the school personnel started the next day.
8. That on August 1, 2012, at 1:34 pm, I went to the Vocational High School in Mayagüez again and the security guard told me that Mrs. Maira Feliciano did not show up.
9. That on August 2, 2012, at 8:10 am, I went back to the Vocational High School and personnel of said school told me that Mrs. Maira Feliciano was excused due to illness since March 2012.
10. That on August 3, 2012, at 12:24 noon, I visited the Vocational High School again and Mrs. Casilda told me that Mrs. Maira Feliciano was not going to return

***Certified Translation***

to work until September 2012, and that she was reported to the State Insurance Fund. That same day, Mrs. Wanda I. Alberon Morales, Director of said school, confirmed the information. In addition, on that same day at 4:49 in the afternoon, I went to the residence of the parents of Mrs. Maira Feliciano Rosado and there was no one there. I also went on two occasions to her residence at Victoria Apartments, Rd. 459 Km. 4.2, Calero Ward in Aguadilla. The neighbors confirmed that Mrs. Maira Rosado lives in apartment #2 and that her vehicle, Toyota Corolla, license plate EDG-052 was in the parking lot but no one answered when I knocked on her door.

***Exhibit 9d***

11. On August 29, 2012, at 8:34, I visited the Vocational High School and Mr. David Rivera, security guard, told me that Mrs. Maira Feliciano Rosado had not returned to work. That day I also went to the residence of the parents of Mrs. Maira Feliciano Rosado and there was no one in the property.

12. On August 29, 2012, at 7:48 pm, I went to the Victoria Apartments in Aguadilla. Mrs. Maira Feliciano Rosado's apartment was in total darkness. Her motor vehicle was not parked in the parking lot.

13. On August 30, 2012, at 8:50 am, I went again to the residence of the parents of Mrs. Feliciano Rosado and spoke with her father who told me that her daughter was not there and asked me not to look for her there anymore because she did not live there.

14. On September 4, 2012, the undersigned visited the Aguadilla City Hall and spoke with Mrs. Heriberta, and I went to the Aguadilla Police Station and spoke with Agent Pérez, badge 8-18604, and both of them told me that they did not know Mrs. Maira Feliciano Rosado.

15. That same day I went to the Aguadilla Post Office and spoke with Mrs. Olga López and Mrs. Nydia Muñoz, who informed me that they were not authorized to give any information about anyone.

16. That I execute this sworn statement for the purpose of certifying the negative service of Mrs. Maira Feliciano Rosado.

17. That what I have stated above is the truth and nothing but the truth.

**AND IN WITNESS WHEREOF, I sign these presents on this day, September 5, 2012.**

**SUHAIL TOLLINCHI HOSTOS**

*Certified Translation*

**AFFIDAVIT NO.: 21,045**

Sworn to and subscribed before me by Mrs. **Suhail Tollinchi Hostos**, of the [aforementioned] personal circumstances and whom I know personally.

In Mayagüez, Puerto Rico, on this 5<sup>th</sup> day of September, 2012.

**NOTARY PUBLIC**

[Partly legible Notarial Seal]:

Roberto San[illeg.]

Attorney-Notary

[One Legal Assistance stamp]  
51428-2012-0905-59575943 - \$3  
09/05/2012

**-CERTIFIED-**

To be a correct translation  
prepared by me, to the best  
of my knowledge and ability

*Annie Flores*

\_\_\_\_\_  
Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

*Exhibit 9e*

**COMMONWEALTH OF PUERTO RICO  
COURT OF FIRST INSTANCE  
MAYAGÜEZ SUPERIOR COURT  
FAMILY RELATIONS DIVISION**

**ANIBAL RODRIGUEZ GARCIA**

**V.**

**CIVIL NO.: ISRF200601752**

**MAYRA FELICIANO ROSADO**

**RE:**

**DIVORCE**

**ORDER**

**TO: MRS. MAYRA FELICIANO ROSADO  
THRU ATTY. OLGA LONGORIA VELEZ  
149 ENRIQUE VAZQUE BAEZ STREET  
MAYAGÜEZ, PR 00680**

You are hereby ordered to appear before the Child Support Examiner on January 2, 2013, at 8:30 AM Atty. Kiani Rodriguez Hernández, (New Judicial Center, 91 Hiram D. Cabassa Ave., Sabalos Ward, Mayagüez, PR, 4<sup>th</sup> floor, Hearing Courtroom 2).

You are being summoned in regard to your alleged obligation of providing child support for the child support receivers mentioned in the complaint at bar. It is recommended that you appear with an attorney, because YOU MUST:

- a. Fill out the Personal and Economic Information Return (PIPE) [Spanish acronym], that is being sent to you with this Order.
- b. Present the same at the Office of the Clerk of the Court of First Instance, Mayagüez Superior Court, five (5) days before the hearing of the case.
- c. Send a copy of the same to the other party, on your own or thru a legal representative, on or before *December 28, 2012*.

**IF YOU ARE THE MOVANT, YOU MUST ALSO:**

- a. Notify defendant of the hearing on or before December 28, 2012, pursuant to the Rules of Civil Procedure.
- b. Submit the following documents:
  - 1) a copy of the Personal and Economic Information Return (PIPE)
  - 2) a copy of the child support complaint
  - 3) a blank copy of the PIPE to be filled out by you

*Certified Translation*

- 4) present and swear at the Office of the Clerk of the Court, the service of notice of the child support hearing.

In accordance with Article 15 of the Child Support Special Act, the information that you provide in the Return exposes you to the penalties inherent to the crime of perjury, if you were to lie therein.

If you do not appear at the hearing without just cause for it, the Hearing Examiner may hold the hearing and present his recommendations.

In Mayagüez, Puerto Rico, on September 18, 2012.

**SGD. EDWIN R. NIEVES TROCHE**  
SUPERIOR COURT JUDGE

**I CERTIFY:** Having notified a copy of the foregoing to Mrs. Mayra Feliciano Rosado thru Atty. Olga Longoria Vélez, to her address of record, having filed the original in the court file on this same date. In Mayagüez, Puerto Rico, on *September 18, 2012*.

**ATTY. NORMA I. SANTANA IRIZARRY**  
REGIONAL CLERK

**BY: NOEMI LUGO DE ARROYO**  
DEPUTY CLERK OF THE COURT

[Illegible seal]

-CERTIFIED-

To be a correct translation  
prepared by me, to the best  
of my knowledge and ability

Annie Flores  
Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

**SWORN STATEMENT**

I, SUHAIL TOLLINCHI HOSTOS, of legal age, single, process server and a resident of Añasco, Puerto Rico, under oath state:

1. That my name and other personal circumstances are the foregoing.
2. That on November 14, 2012, I received the child support subpoena in the case of Aníbal Rodríguez García v. Mayra Feliciano Rosado, Civil No. ISRF-2006-01752.
3. That said case is summoned for next January 2, 2012.
4. That on November 25, 2012 at 11:40 am, November 27, 2012 at 10:55 am and December 8, 2012 at 3:00 pm, I visited the Victoria Apartment, Road 459, Km. 4.2 in the Calero Ward in Aguadilla, to serve the aforementioned Order, but said efforts were fruitless.
5. That Mrs. Mayra Feliciano Rosado has a Toyota Corolla motor vehicle, license plate EDG-052, and said vehicle was not parked in the parking lot where Mrs. Feliciano lives.
6. That on December 10, 2012, at 8:27 am, I visited the Mayagüez Vocational School, Mrs. Mayra Feliciano's place of work, and there I was informed by a secretary by the name of Monsie, that Mrs. Feliciano was reported to the State Insurance Fund and that her father would come to pick up the check, but that she had no other information.
7. That on several occasions I have passed by the residence of Mrs. Mayra Feliciano's parents at 154 Elena Segarra Street, El Maní in Mayagüez, Puerto Rico.
8. That I make this sworn statement for the purpose of certifying the negative service of Mrs. Mayra Feliciano Rosado.
9. That the aforesated is the truth and nothing but the truth.

**AND IN WITNESS WHEREOF**, I sign these presents on this 20<sup>th</sup> day of December, 2012.

[Signed]  
**SUHAIL TOLLINCHI HOSTOS**

*Certified Translation*

**AFFIDAVIT NO: 21,103**

Sworn to and subscribed before me by **Mrs. Suhail Tollinchi Hostos**, of the personal circumstances [stated above], and whom I know personally.

In Mayagüez, Puerto Rico, on this 20<sup>th</sup> day of December, 2012.

[Notarial seal]:  
[illeg.] ROBERTO SANTOS  
ATTORNEY-NOTARY

**NOTARY PUBLIC**

[One(1) Legal Assistance stamp]:  
52525-2012-1217-48371608 - \$5

-CERTIFIED-

To be a correct translation  
prepared by me, to the best  
of my knowledge and ability

Annie Flores

Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

**Exhibit 10**

COMMONWEALTH OF PUERTO RICO  
DEPARTMENT OF THE FAMILY  
FAMILY AND CHILDREN'S ADMINISTRATION

ADFAN-SFN-109-A  
OCTOBER 2007  
REV. SEPTEMBER 2008

Original-Professional  
Copy – Family File

**NOTICE OF ACTION TAKEN  
WITH CHILD ABUSE REFERRAL**

RMO:

Referral Number: R09-07-34732

06/14/2010

Date

Mrs.: Mayra Feliciano  
154 Elena Segarra Street  
Maní Ward, Mayagüez, PR

Pursuant to the provisions of Law No. 177 of August 1, 2003, as amended, known as the Children's Well-Being and Integral Protection Act, the Family and Children's Administration of the Department of the Family "shall investigate, require or refer so that the referred cases of abuse, institutional abuse, negligence and/or institutional negligence are investigated" (Article 4). For this purpose, the captioned referral was investigated with the following result:

With legal basis, for which reason the minors' protection services will be offered at the local office of \_\_\_\_\_.

Without legal basis.

Completely false.

Rights and Duties:

1) Appeal:

If you understand that the decision of the agency has affected you adversely, or that the determination is not in accordance with the established rules and procedures, you have the right to submit an appeal before a Hearing Examiner of the agency. The appeal must be submitted within the next fifteen calendar days from the date of notice, with the Adjudicative Board of the Department of the Family, Box 11398, Santurce, Puerto Rico 00910. (Article 13, Regulation 6918 of December 20, 2004; Regulations for the Implementation of the Children's Well-Being and Integral Protection Act, Law No. 177 of August 1, 2003).

2) Rights of the Subject of the Report: (Article 10, Regulation 6918)

- With legal basis

Request a copy of the information which is in the Central Registry regarding your case. It will be approved if it is not contrary to the minor's best interests and measures are taken to protect the confidentiality of the person who reported the situation in good faith, or that cooperated during the investigation of the same.

*Certified Translation*

- Without legal basis

Request that the report be amended or that your name be eliminated from the Central Registry. You must submit your request in writing within the period of thirty days after receiving notification that there is no legal basis. You may file your written request with the Family and Children's Administration, Central Registry, 58 Sevilla Plaza Building, PO Box 194090, San Juan, Puerto Rico 00910-4090.

"If the request for information is denied, the person affected by the decision of the Clerk's Office, may turn to the Court of Appeals in a term not greater than thirty days from the date of notice of the final determination made". (Article 25, Law No. 177).

Norma E. Pagán  
Name of TS / TSF [Social Worker] [Signed] \_\_\_\_\_ / \_\_\_\_\_  
Signature \_\_\_\_\_ Lic. No. \_\_\_\_\_ Date 06/14/2010

[Illegible]  
Name of Supervisor [Illegible signature] \_\_\_\_\_ 9345  
Signature \_\_\_\_\_ Lic. No. \_\_\_\_\_ Date

**-CERTIFIED-**

To be a correct translation  
prepared by me, to the best  
of my knowledge and ability

Annie Flores  
Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

**Exhibit 10b**

COMMONWEALTH OF PUERTO RICO  
DEPARTMENT OF THE FAMILY  
FAMILY AND CHILDREN'S ADMINISTRATION

ADFAN-SFN-109-A  
OCTOBER 2007  
REV. SEPTEMBER 2008

**NOTICE OF ACTION TAKEN  
WITH CHILD ABUSE REFERRAL**

Original-Professional  
Copy – Family File

RMO:

Referral Number: R10-09-41625

10/13/2011

Date

Mrs.: MARGARITA FELICIANO ROSADO  
MANI WARD  
154 ELENA SEGARRA STREET  
MAYAGÜEZ, PR 00680

Pursuant to the provisions of Law No. 177 of August 1, 2003, as amended, known as the Children's Well-Being and Integral Protection Act, the Family and Children's Administration of the Department of the Family "shall investigate, require or refer so that the referred cases of abuse, institutional abuse, negligence and/or institutional negligence are investigated" (Article 4). For this purpose, the captioned referral was investigated with the following result:

With legal basis, for which reason the minors' protection services will be offered at the local office of N/A.  
 Without legal basis.  
 Completely false.

Rights and Duties:

3) Appeal:

If you understand that the decision of the agency has affected you adversely, or that the determination is not in accordance with the established rules and procedures, you have the right to submit an appeal before a Hearing Examiner of the agency. The appeal must be submitted within the next fifteen calendar days from the date of notice, with the Adjudicative Board of the Department of the Family, Box 11398, Santurce, Puerto Rico 00910. (Article 13, Regulation 6918 of December 20, 2004; Regulations for the Implementation of the Children's Well-Being and Integral Protection Act, Law No. 177 of August 1, 2003).

4) Rights of the Subject of the Report: (Article 10, Regulation 6918)

- With legal basis  
Request a copy of the information which is in the Central Registry regarding your case. It will be approved if it is not contrary to the minor's best interests and

*Certified Translation*

measures are taken to protect the confidentiality of the person who reported the situation in good faith, or that cooperated during the investigation of the same.

• Without legal basis

Request that the report be amended or that your name be eliminated from the Central Registry. You must submit your request in writing within the period of thirty days after receiving notification that there is no legal basis. You may file your written request with the Family and Children's Administration, Central Registry, 58 Sevilla Plaza Building, PO Box 194090, San Juan, Puerto Rico 00910-4090.

"If the request for information is denied, the person affected by the decision of the Clerk's Office, may turn to the Court of Appeals in a term not greater than thirty days from the date of notice of the final determination made". (Article 25, Law No. 177).

Mrs. Awilda Detrés Rosado [Signed] 105317 10/13/2011  
Name of TS / TSF [Social Worker] Signature Lic. No. Date

[Illegible] /s/ Gloria Ruiz 8843 10/25/2011  
Name of Supervisor Signature Lic. No. Date

**-CERTIFIED-**

To be a correct translation  
prepared by me, to the best  
of my knowledge and ability

Annie Flores  
Annie Flores  
U.S. Certified Court Interpreter  
M.A. in Translation

*Certified Translation*

*Exhibit 10c*

COMMONWEALTH OF PUERTO RICO  
DEPARTMENT OF THE FAMILY  
FAMILY AND CHILDREN'S ADMINISTRATION

ADFAN-SFN-109-A  
OCTOBER 2007  
REV. SEPTEMBER 2008

**NOTICE OF ACTION TAKEN  
WITH CHILD ABUSE REFERRAL**

Original-Professional  
Copy – Family File

RMO:

Referral Number: R09-07-34732

06/14/2010

Date

Mrs.: Mayra Feliciano  
154 Elena Segarra Street  
Maní Ward, Mayagüez, PR

Pursuant to the provisions of Law No. 177 of August 1, 2003, as amended, known as the Children's Well-Being and Integral Protection Act, the Family and Children's Administration of the Department of the Family "shall investigate, require or refer so that the referred cases of abuse, institutional abuse, negligence and/or institutional negligence are investigated" (Article 4). For this purpose, the captioned referral was investigated with the following result:

With legal basis, for which reason the minors' protection services will be offered at the local office of \_\_\_\_\_.

Without legal basis.

Completely false.

Rights and Duties:

5) Appeal:

If you understand that the decision of the agency has affected you adversely, or that the determination is not in accordance with the established rules and procedures, you have the right to submit an appeal before a Hearing Examiner of the agency. The appeal must be submitted within the next fifteen calendar days from the date of notice, with the Adjudicative Board of the Department of the Family, Box 11398, Santurce, Puerto Rico 00910. (Article 13, Regulation 6918 of December 20, 2004; Regulations for the Implementation of the Children's Well-Being and Integral Protection Act, Law No. 177 of August 1, 2003).

6) Rights of the Subject of the Report: (Article 10, Regulation 6918)

- With legal basis

Request a copy of the information which is in the Central Registry regarding your case. It will be approved if it is not contrary to the minor's best interests and measures are taken to protect the confidentiality of the person who reported the situation in good faith, or that cooperated during the investigation of the same.